

12 ARCHITECTURAL HERITAGE IMPACT ASSESSMENT

12.1 Introduction

This chapter describes the likely significant effects on architectural heritage arising from the existence of a proposed residential landmark building on former industrial lands at 42A Parkgate Street, Dublin. These lands were formerly occupied by the Hickey Home Focus fabric company.

No works to any protected structures or other historic structures of heritage value on the 42A Parkgate Street site are proposed as part of the current application and so the existence of the proposed residential landmark building will not give rise to any direct effects on the architectural heritage of these structures. Permission was granted by An Bord Pleanála in May 2020 for works to protected and historic structures on the 42A Parkgate Street site, including the demolition of some structures, ABP reference 306569-20. The current application does not propose any changes to what was approved under that permission.

This Chapter has been prepared by W.H. Hastings of ARC Architectural Consultants Ltd. Bill is an architect, Fellow of the Royal Institute of the Architects of Ireland and RIAI Grade 1 accredited Conservation Architect, with fifty years' experience working in architecture and architectural services. He has particular experience in conservation, measured survey and recording, digital modelling & photomontage and environmental impact assessment.

Please refer to **Chapter 1** for further details on his relevant qualifications and experience.

12.2 Assessment methodology

12.2.1 General

A desktop study of the *Dublin City Development Plan 2016-2022* and of the Record of Protected Structures, as set out therein, and the National Inventory of Architectural Heritage was carried out to identify structures and places of architectural heritage value in the vicinity of the proposed development and policies relating to the protection of Dublin's historic environment. ARC carried out considerable research of relevant books, historic documents and historic mapping as part of this assessment. In addition, a series of site visits was carried out to determine the likely impact of the proposed development on architectural heritage. This assessment was prepared with reference to the Department of Arts, Heritage and the Gaeltacht's Architectural Heritage Protection Guidelines for Planning Authorities

12.2.2 Impact Assessment Methodology

Section 51(1) of the *Planning and Development Act 2000* (as amended) states:

For the purpose of protecting structures, or parts of structures, which form part of the architectural heritage and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, every development plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such interest within its functional area.

Therefore, the Act defines architectural heritage as connected to architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. It is for each Planning Authority to decide if a structure is of sufficient special interest with regard to any or all of these eight indicators to warrant that structure being entered in the Record of Protected Structures. Structures that are not Protected Structures may still be of heritage value because they are considered as having some level of interest under one or more of the eight indicators. It follows, therefore, that the extent of impact or effect on the architectural heritage of a structure will be measured by extent to which its heritage interest is altered or removed. The effect can be positive if the heritage interest is enhanced or negative if the heritage interest is diminished.

The assessment effects on Architectural Heritage had regard to the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency (Draft of 2017), and to Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the likely effects of certain public and private projects on the environment.

The list of definitions given below is taken from *Table 3.3: Descriptions of Effects* contained in the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency. Some comment is also given below on what these definitions might imply in the case of architectural heritage. The definitions from the EPA document are in italics.

- *Imperceptible: An effect capable of measurement but without significant consequences.* The definition implies that there would be minor change to an aspect of the heritage interest of a structure, but not one that would be readily noticeable to the casual observer; and not a change that would materially alter the overall heritage interest of the structure or its surroundings.
- *Not Significant: An effect which causes noticeable² changes in the character of the environment but without significant consequences* (the footnote '2' to the word 'noticeable' is: 'for the purposes of planning consent procedures'). The definition implies that there would be changes to aspects of the heritage interest of a structure capable of being noticed by an observer who is actively assessing the effects of changes to the heritage interest of a structure for the purposes of planning consent, and, although there may be changes to aspects of the heritage interest of a structure, these changes would not be considered material with reference to planning consent.
- *Slight: An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.* The definition implies that there would be changes to aspects of the heritage interest of a structure or part of that structure. However, apart from such changes, the overall heritage interest of the structure, and/or its contribution to its surroundings, would remain substantially intact.
- *Moderate: An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.* In this case, there would be material changes to the heritage interest of a structure or part of that structure. These changes must be consistent with a pattern of change that is already occurring, is considered acceptable, and is envisaged by policy.
- *Significant: An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.* The definition implies that there would be material changes to aspects the heritage interest of a structure or part of that structure and that these changes would not be consistent with an acceptable pattern of change that is already occurring, nor are envisaged by policy.
- *Very Significant: An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.* The definition implies that the heritage interest of a structure would be changed to a considerable degree and these changes would not be consistent with an acceptable pattern of change that is already occurring or envisaged by policy. For example, a "very significant" effect would occur where the heritage interest of a structure or structures would be substantially removed as a result of a proposed development, though parts of the structure might remain intact.
- *Profound: An effect which obliterates sensitive characteristics.* The definition implies that a development would result in the loss of the heritage structure, or all of its heritage significance.

The above *Descriptions of Effects* relate to effects on Architectural Heritage. This assessment relates solely to effects on Architectural Heritage, and does not concern itself with other effects, beneficial or adverse.

The extent of effects on the architectural heritage of the surrounding area resulting from the complete loss of a structure of heritage interest will depend on the importance of the structure. The removal of a heritage structure might result in a whole range of potentially significant beneficial effects in terms of planning gain and sustainable development; but these are not of themselves positive effects on architectural heritage and are not evaluated as part of the assessment of effects on architectural heritage.

It is noted that there are a number of scenarios in which substantial alteration to heritage structures is supported by heritage policy. Giving a heritage building a new and sustainable use would be one such situation. In such circumstances the degree of intervention in the heritage structure must be only the minimum necessary to provide for the new use. Unnecessary interventions would have to be assessed as resulting in negative effects on architectural heritage.

12.2.3 Study Area

The assessment of the potential for effects on architectural heritage arising from the existence of the development examined the River Liffey Corridor from Dublin Port to west of Island Bridge, the Phoenix Park and the lands of the Royal Hospital Kilmainham, and areas of Dublin City north, east and south of the subject site up to a distance of 1 kilometre from the site.

12.2.4 Consultation

Since the summer of 2018, there has been continuous consultation between ARC, the design team and the planning consultants in relation to the architectural heritage significance of structures on the application site and the potential effects of development on those structures. This process informed both the assessment of effects on architectural heritage, if any, and design of the proposed development.

As part of the Strategic Housing Development process material has been provided to An Bord Pleanála and there was a meeting with the Board, attended by the development team and the Planning Authority on the 15th of April 2021. ARC also attended this meeting. Subsequent to the meeting the Board issued a Pre-Application Consultation Opinion, and ARC's assessment has had regard to this opinion.

12.3 Statutory Provisions

Chapter 11: Built Heritage and Culture of the *Dublin City Development Plan 2016-2022* sets out the Planning Authority's policies with regard to architectural heritage. Policy CHC1 provides that it is a policy of the Planning Authority *"to seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city."*

Policy CHC4 provides:

"It is the policy of Dublin City Council 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.*

Development will not:

- 1. Harm buildings, spaces, original street patterns or other features which contribute positively to the special interest of the Conservation Area*

2. *Involve the loss of traditional, historic or important building forms, features, and detailing including roof-scapes, shop-fronts, doors, windows and other decorative detail*
3. *Introduce design details and materials, such as uPVC, aluminium and inappropriately designed or dimensioned timber windows and doors*
4. *Harm the setting of a Conservation Area*
5. *Constitute a visually obtrusive or dominant form.*

Changes of use will be acceptable where, in compliance with the zoning objective, they make a positive contribution to the character, function and appearance of Conservation Areas and their settings. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications and will promote compatible uses which ensure future long-term viability."

The Development Plan acknowledges, under Section 11.1.5.8, that there may be circumstances under which the demolition of a protected structure must take place as follows: *"The City Council accepts that in some circumstances the loss of a heritage structure (protected structure or non-protected structure of merit) may be the only option and this may be permitted where it will secure substantial public benefit or where there is no other viable option. Decisions on the acceptability of demolition will be reached having regard to the significance of the structure and the guidance as set out in the Guidelines for Planning Authorities on Architectural Heritage Protection published by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs (2011)."*

The *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* set out comprehensive advice in relation to conservation and the management of the historic built environment. However, the Guidelines clearly advocate a balanced approach. For example, while the Guidelines state *"historic structures are a unique resource. Once lost, they cannot be replaced. If their special qualities are degraded, these can rarely be recaptured."* (Section 7.2.1), the Guidelines also clarify that *"entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance."* (Section 7.2.2).

The Guidelines advocate strongly for ensuring that heritage buildings are kept in active use as a mechanism for ensuring conservation of buildings of architectural heritage value, as set out at Section 7.3:

"It is generally recognised that the best method of conserving a historic building is to keep it in active use. Where a structure is of great rarity or quality, every effort should be made to find a solution which will allow it to be adapted to a new use without unacceptable damage to its character and special interest. Usually the original use for which a structure was built will be the most appropriate, and to maintain that use will involve the least disruption to its character. While a degree of compromise will be required in adapting a protected structure to meet the requirements of modern living, it is important that the special interest of the structure is not unnecessarily affected. Where a change of use is approved, every effort should be made to minimise change to, and loss of, significant fabric and the special interest of the structure should not be compromised."

Section 7.7 is relevant to the subject application as it promotes minimum intervention with buildings of architectural heritage value:

"7.7.2 In granting planning permission, a planning authority should be satisfied that works are necessary, whether these be repair works to the fabric of the building or adaptations to the structure to allow it to perform a new or enhanced function. Over-restoration of historic buildings can be detrimental to their character and value. Old buildings both charm and inform for the very reason that they are old. Bulging or leaning walls, unevenness and bowing are not necessarily imperfections to be ironed out but are evidence of the building's antiquity. Such evidence of a patina of age is irreplaceable and should be preserved where possible with appropriate professional advice.

7.8.2 In order to appreciate the integrity of a structure, it is important to respect the contribution of different stages of its historical development. Concentration on whether or not various parts of a building are 'original' can obscure the fact that later alterations and additions may

also contribute to the special interest of the structure. Of course there may be alterations or additions which have not contributed to the special interest of the building, and which may in fact have damaged it.

- 7.9.2 *Many historic structures date from a time when the majority of building materials were wrought by hand. These materials have a variety and vitality that cannot be matched by machine-made materials. Tooling and chisel marks on stonework, undulations in blown-glass panes, and adze marks on timber elements supply a wealth of irreplaceable information about the people and the times that produced these structures. Also, through time, a structure and its components acquire a patina of age that cannot be replicated. The unnecessary replacement of historic fabric, no matter how carefully the work is carried out, will have an adverse effect on the character of a building or monument, seriously diminish its authenticity and will significantly reduce its value as a source of historical information. Replacing original or earlier elements of a building with modern replicas only serves to falsify the historical evidence of the building.”*

Section 8.3 relates to the repointing of stonework

- “8.3.15 Repointing has the potential to cause physical damage to the fabric of the building, radically alter its appearance and substantially detract from its character and quality. A proposal to repoint stonework of a protected structure, which would materially alter its character, requires planning permission; and, where permitted, the work should be carried out by experienced people and under the direction of a specialist with a working knowledge and experience of historic buildings.*

- 8.3.16 Repointing should be considered a repair which replaces lost or damaged fabric with that of a compatible and appropriate mix (or series of mixes), material and appearance, providing always that the existing pointing is not inappropriate or damaging to the stonework. Comprehensive repointing of a structure is rarely necessary, unless the existing pointing has deteriorated and is causing damage to the stonework or other fabric. It should be a condition that sound old pointing is left undisturbed as it is an essential part of the fabric and character of a historic building or structure and should not be removed unnecessarily.”*

and Section 13.1 regarding determining the curtilage of a protected structure:

- “13.1.1 By definition, a protected structure includes the land lying within the curtilage of the protected structure and other structures within that curtilage and their interiors. The notion of curtilage is not defined by legislation, but for the purposes of these guidelines it can be taken to be the parcel of land immediately associated with that structure and which is (or was) in use for the purposes of the structure. It should be noted that the meaning of ‘curtilage’ is influenced by other legal considerations besides protection of the architectural heritage and may be revised in accordance with emerging case law...*

- 13.1.3 It should be noted that the definition of curtilage does not work in reverse – a stable building may be within the curtilage of the main house which it was built to serve but the main house cannot be described as being within the curtilage of the stable building. It should also be noted where a protected structure is an element of a structure, it may, or may not, have a curtilage depending on the degree to which it could in its own right be considered to be a structure. For example, a re-used doorway affixed to a later structure could not be said to have a curtilage.”*

12.4 Receiving Environment

In categorising the baseline environment, ARC sought first to identify structures and features of known architectural heritage merit with reference to the Dublin City Council Record of Protected Structures and to the National Inventory of Architectural Heritage. ARC carried out a desktop review of relevant sources on the development of the area and conducted comparative assessment of relevant historic mapping and present day Ordnance Survey mapping in order to identify whether any other structures of architectural heritage value (i.e. structures not listed as protected structures or referenced in the NIAH) may be located on the site or in the vicinity of the application.

The site of the proposed development is the relatively small eastern tip of a larger development site that was until recently occupied by the Hickeys fabric company. The address of this larger site is 42A Parkgate Street, and an extensive Strategic Housing Development was granted permission on the larger western portion of this site in the summer of 2020, ABP Reference 306569-20. The overall site at 42A Parkgate Street lies at the eastern end of an historic strip of land along the north bank of the River Liffey sloping down from Conyngham Road and Parkgate Street and the River, and running west from Parkgate street all the way to Chapelizod. This strip of land is referred to on Rocque's Map of 1773 and on other maps of the late 18th and early 19th centuries, as the Long Meadows. The first buildings on the Long Meadows appear to have been the buildings of the Phoenix Ironworks, founded by Richard Robinson in 1808. The Hickeys site occupies the eastern half of the lands of the former ironworks. The entry for Richard Robinson in the Dictionary of Irish Architects is as follows:

Engineer and ironfounder of the Phoenix Iron Works, Parkgate Street. Richard Robinson, a native of Hull, settled in Dublin in 1800. His Phoenix foundry was responsible for casting King's Bridge, designed by GEORGE PAPWORTH to commemorate the visit of George IV to Dublin in 1823. The foundry acquired the designation 'Royal' in this year. Robinson died in 1848 and is buried in St Michan's Church of Ireland church. By 1844 he had been succeeded in the business by William Robinson who carried on until 1858 or later. By 1863 the foundry had been taken over by Edward Toomey.

Edward Toomey ran the Royal Phoenix Ironworks until his death in the late 1870s.

The entry in Thoms Directory for the Royal Phoenix Ironworks for 1880 shows that it was vacant at that date. There was a long advertisement for the sale of the Ironworks in the Freemans Journal of the 24th of January 1880, part of which is as follows:

CITY OF DUBLIN. TRUSTEES' SALE OF EXTENSIVE PREMISES, PLANT, STOCK. &c. IMPORTANT TO IRON FOUNDERS, ENGINEERS, DISTILLERS,

C. JAMES CONNOLLY and SON have been instructed by the Trustees of the late Edward Toomey.

TO DISPOSE OF BY PUBLIC AUCTION, On the Premises, on WEDNESDAY, 4th February, 1880, Their Interest in all that and those the extensive concerns known as the Royal Phoenix Iron Works, adjoining the King's-bridge at Parkgate-street, and close to the terminus of the Great Southern and Western Railway, together with the superior Dwellinghouse, Out-offices, Pleasure Grounds, Gardens, &c., the entire containing 3a 6r 38p statute measure, with a handsome entrance from Parkgate-street, the river Anna Liffey being its boundary in the south. There are also eight two-storied Cottages for workmen, with foundry workshops, forge, &c. where a considerable trade was successfully carried on for many years; there being also a great facility of water carriage up and down the river Liffey for the export and import of heavy articles connected with the trade.

This advertisement, together with the evidence of early Ordnance maps indicates what structures were on the overall Hickey's site prior to 1880. The First Edition Ordnance map of 1837, though at the small scale of 6 inches to the mile indicates that the house near the north west corner of the present site was there in 1837, as was the gateway from Parkgate Street. The larger scale 1847 Ordnance map tends to confirm this. The round turret at the eastern point of the site is shown on both maps. A second turret, some distance west of the present site and now gone, is also shown. The building directly abutting the river is shown as much smaller than the Hickey's warehouse building, otherwise buildings of the Royal Phoenix Ironworks are set back from the river. The present high stone wall to the river can only in part date from the time of the Royal Phoenix Ironworks, and the pattern of the stonework on the present wall shows that it has been altered many times.

The entry on Thoms Directory for 1882 is: *Royal Phoenix Ironworks.*, with a rateable valuation of £10 and on a second line: *The Kingsbridge Woollen Works.* This is the last mention of the Phoenix Ironworks. In Thoms Directory the name of the business operating at the address continues to be *The Kingsbridge Woollen Works* until 1888. From 1885 to 1888 the name is: *Guinness, Edward C, Cloth Manufacturer.* In 1885 he is plain *Guinness, Edward C,* in 1888 *Guinness, Sir Edward C, Bart.*

In Thoms Directory the valuation for the Royal Phoenix Ironworks falls from £130 in 1870 and 1880 to just £10 in 1882. By 1886, under the direction of Edward C. Guinness, the valuation had risen to £405. The evidence from Thom's Directory, taken together with the evidence of Ordnance mapping and other historical evidence, strongly indicates that the main Hickey's warehouse on the site and the two gabled buildings to the south west of it were built between 1882 and 1886 under the direction of Edward C. Guinness for the Kingsbridge Woollen Works.

Evidence from Ordnance mapping indicates that most of the buildings and structures that formed part of the Royal Phoenix Ironworks were demolished and replaced between 1864 and 1889. On the 1889 Ordnance map the layout of the buildings on the Hickeys site is shown to be largely similar to the present layout. The disposition of the buildings of the Royal Phoenix Ironworks was quite different. On the 1889 map the extensive new eastern building is shown with a northlight roof.

Edward Cecil Guinness, later to become the 1st Earl of Iveagh, had been the sole owner of the Guinness Brewery since 1876. In 1881 he bought the premises of the Royal Phoenix Ironworks and established the Kingsbridge Woollen Works in order to provide employment for young girls, which was scarce in Dublin at the time. He spent some £50,000 on constructing the new works, an enormous sum at the time. The Kingsbridge Woollen Works employed around 150 women; but the experiment failed, with the Woollen Works losing between £3,000 and £4,000 per year.

For the year 1889, the entry in Thoms Directory is as follows:

The Kingsbridge Mills, Clayton F. & J. and Co (Limited), Woollen Worsted Manufacturers, and Navan, £405 Kingsbridge House, Fred Clayton M.D. M.A. F.S.A. Ph.D. Woollen Manufacturer.

The firm of F & J Clayton and Co, owned by Frederick and John Clayton was established in Navan in 1837. In 1867 they took over a large mill at Millbrook on the river Blackwater just outside Navan. The Clayton family had been running mills at Horton in Yorkshire for the previous 200 years. Clayton's Woollen Mills at Navan was a very large concern. It continued in business until the 1960s.

Claytons only operated the woollen mills at Parkgate Street for a relatively short period. Thoms Directory for 1900 refers to the premises as the *Phoenix Park Works*, operated by Charles McDonnell and Son, Manufacturers. In 1910 and 1916 the Phoenix Park Works are listed as being vacant. In 1917, the premises are listed as the *Dublin National Shell Factory*, a munitions factory, and continue to have that listing until 1920. In 1921 and 1922 the premises is listed as Government Stores. In 1924 the premises is listed as Cahill and Co. Ltd: Printers, Etc. Cahill Printers remained at Parkgate Street till the 1970s, when the premises was taken over by Hickeys.

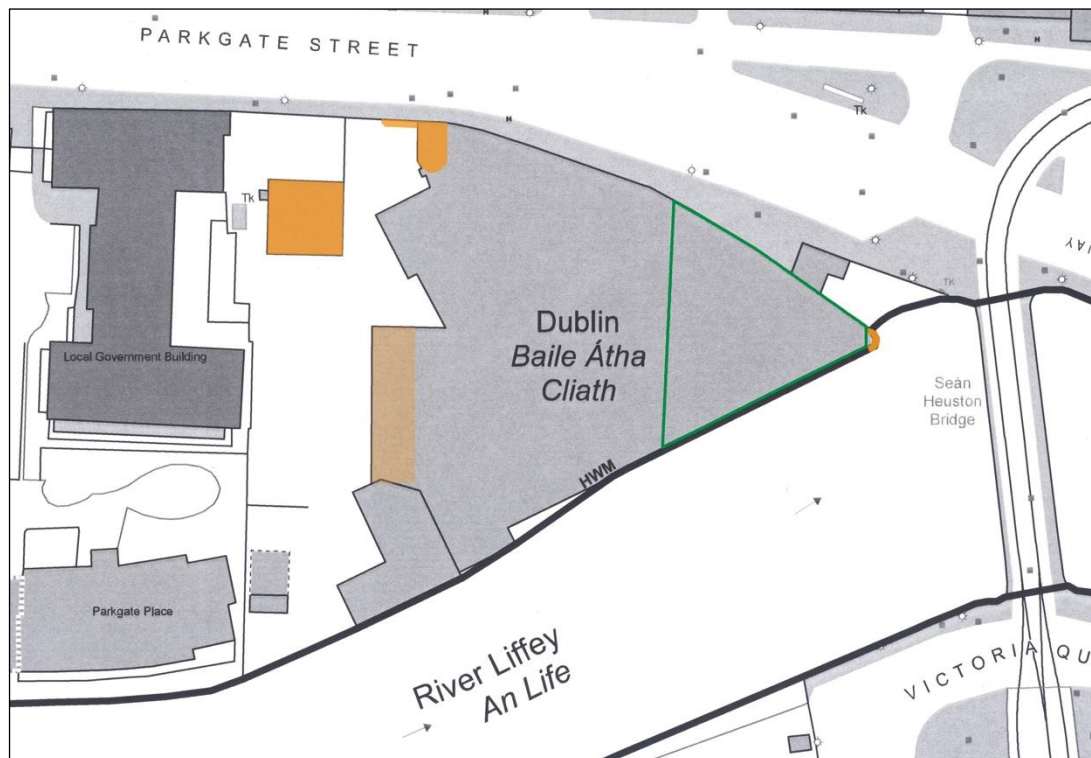


Figure 12.1: Extract from the current Ordnance map, indicating, in orange, structures on the overall 42A Parkgate Street site that appear on the 1837 First Edition Ordnance map. Most of the other structures date from the mid 1880s. The green line indicates the approximate boundary of site of the proposed residential landmark building.

Extracts from Thoms Directory for the Subject Site

1861	Phoenix Ironworks, Wm Robinson, Engineer and Ironfounder
1870	Royal Phoenix Ironworks, Edward Toomey, Millwright, Engineer and Iron Founder. £130
1880	Royal Phoenix Ironworks. Vacant. £130
1881	Royal Phoenix Ironworks. Mrs Toomey. £130
1882	Royal Phoenix Ironworks. £10 The Kingsbridge Woollen Works
1883	The Kingsbridge Woollen Works
1884	The Kingsbridge Woollen Works
1885	Guinness, Edward C, Cloth Manufacturer The Kingsbridge Woollen Works
1886	Guinness, Edward C, Bart, Cloth Manufacturer The Kingsbridge Woollen Works £405
1887	Guinness, Edward C, Bart, Cloth Manufacturer The Kingsbridge Woollen Works £405

Extracts from Thoms Directory for the Subject Site

1888	Guinness, Sir Edward C, Bart, Cloth Manufacturer The Kingsbridge Woollen Works £405 (Premises Closed)
1889	The Kingsbridge Mills, Clayton F. & J. and Co (Limited), Woollen Worsted Manufacturers, and Navan £405 Kingsbridge House, Fred Clayton M.D. M.A. F.S.A. Ph.D. Woollen Manufacturer
1890	The Kingsbridge Mills, Clayton F. & J. and Co (Limited), Woollen Worsted Manufacturers, and Navan Kingsbridge House, Fred Clayton M.D. M.A. F.S.A. Ph.D. Woollen Manufacturer
1900	Phoenix Park Works, McDonnell, Charles and Son, Manufacturers Kingsbridge House, Cussen, Mr E, £225 £40
1910	Phoenix Park Works. Vacant. £225 £40 1916 Phoenix Park Works. Vacant. £225 £40
1917	Dublin National Shell Factory. Directors: Kelly, Capt. R. C; Downie, Capt. F; Grey, Lewis C., C.A.; Sec: Shaw, Crawford. £366
1920	Dublin National Shell Factory; Inspector of Stores and Clothing, Receiving Depot and Pattern Room.
1921	Government Stores, Inspector of Stores and Clothing, Receiving Depot and Pattern Room.
1922	Government Stores, Inspector of Stores and Clothing, Receiving Depot and Pattern Room.
1923	No Listing
1924	Cahill and Co. Ltd: Printers, Etc
1925	Cahill and Co. Ltd: Printers, Etc £490
1930	43. Cahill and Co. Ltd: Printers, Etc £545
1941	43. Cahill and Co. Ltd: Printers, Etc £545 46. Kiosk £4'10'0
1950	43. Cahill and Co. Ltd: Printers, Etc £545 46. Kiosk £4'10'0
1960	43. Cahill and Co. Ltd: Printers, Bookbinders, Publishers. £525 Parkside Press Ltd: Publishers
1971	43. Cahill and Co. Ltd: Letterpress and Lithographic Printers and Bookbinders. £525 Parkside Press Ltd: Publishers, Mellifont Press Ltd: Publishers
1980	43. Hickey and Co. Ltd : Fabrics. £525



Figure 12.2: Extract from John Rocques map of Dublin of 1773. Conyngham Road and Parkgate Street are not named. The 'Long Meadows' are shown on the north side of the River Liffey. Kingsbridge is not yet there. The Viceregal Stream is shown running into the Liffey at the east end of the Long Meadows. Where the Stream meets the River is the immediately west of the location of the Turret at the east end of the 42A Parkgate Street site.



Figure 12.3: Extract from Duncan's Map of Dublin of 1821. The map indicates a triangle of buildings and two other small buildings on the 42A Parkgate Street site. At that date the surrounding area of the city and all the lands to the south and west are dominated by military buildings and institutions. The Wellington Testimonial, construction of which would only have just started, is shown in the centre of a group of military buildings: The Magazine Fort, The Royal Infirmary, The Royal Barracks, The Royal Hospital and The Artillery Barracks.

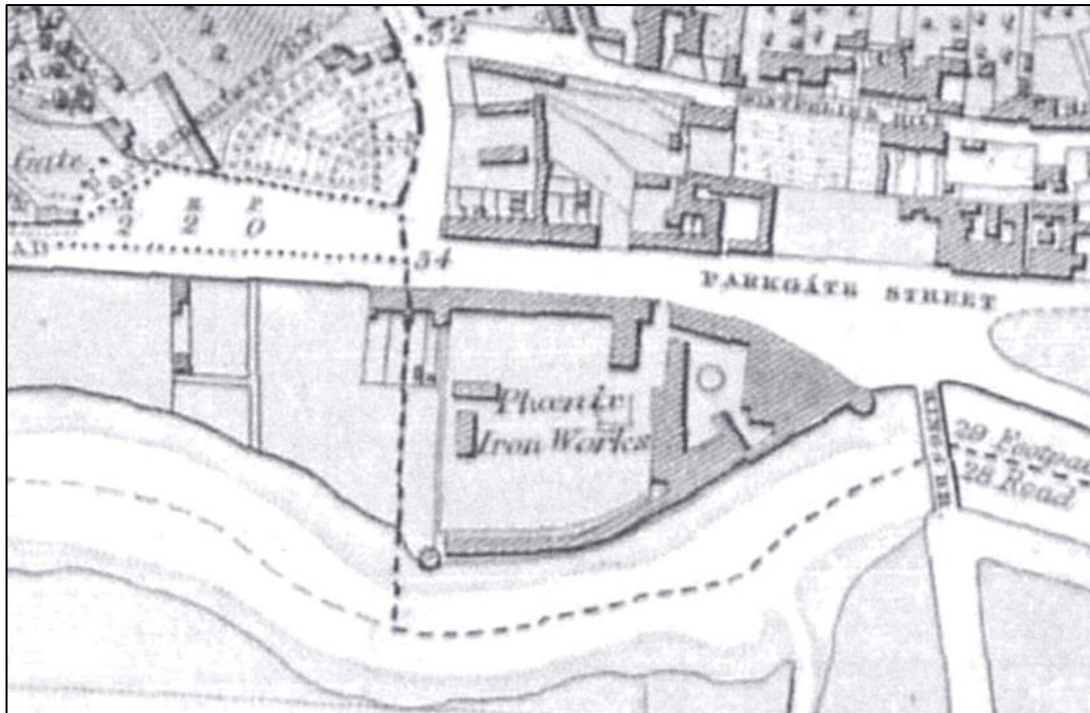


Figure 12.4: Enlargement of part of the First Edition Ordnance map of 1837, showing the original extent of the Phoenix Iron Works, which was approximately twice the area of the 42A Parkgate St site. The map shows round turrets at the eastern and western end of the river frontage.

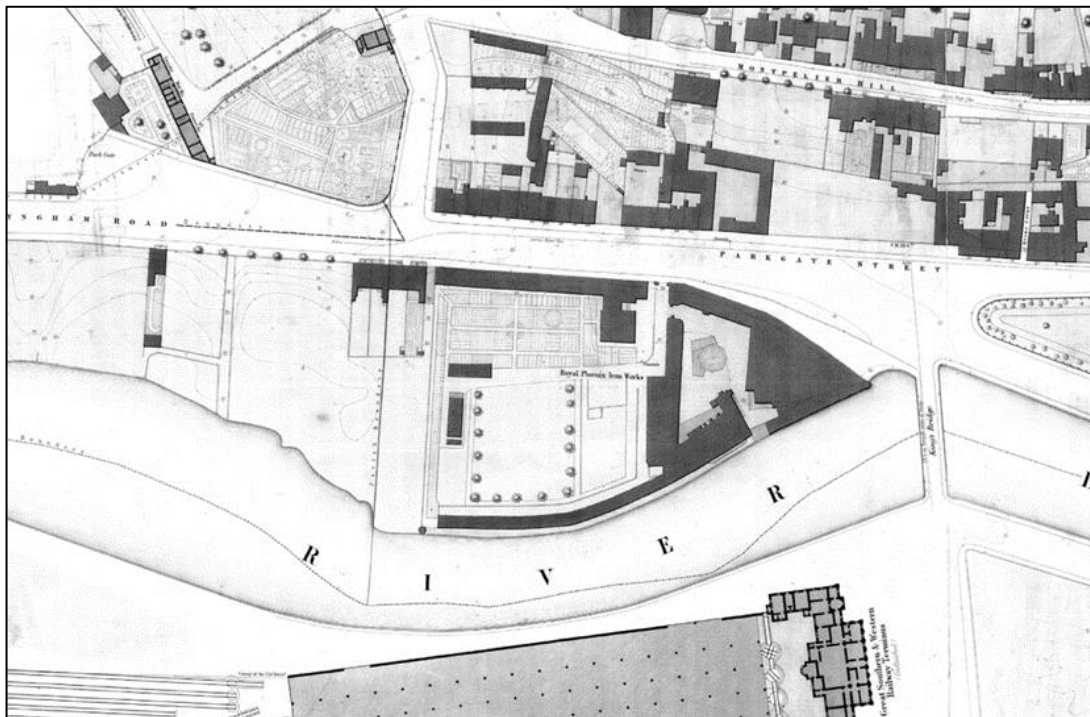


Figure 12.5: Extract from the Ordnance map of 1847. Kingsbridge station is shown on the south side of the river, though marked as 'unfinished'. The production buildings of the now Royal Phoenix Ironworks would appear all to have been at the east end of the site, and the western end is shown laid out as gardens. Only the most easterly building on the site abuts the River. The rest are set back. There appears to be a slipway from the centre yard of the works down to the River. Where walls are shown on the map, these were probably of the nature of garden walls, and unlikely to have been more than 2 metres in height.

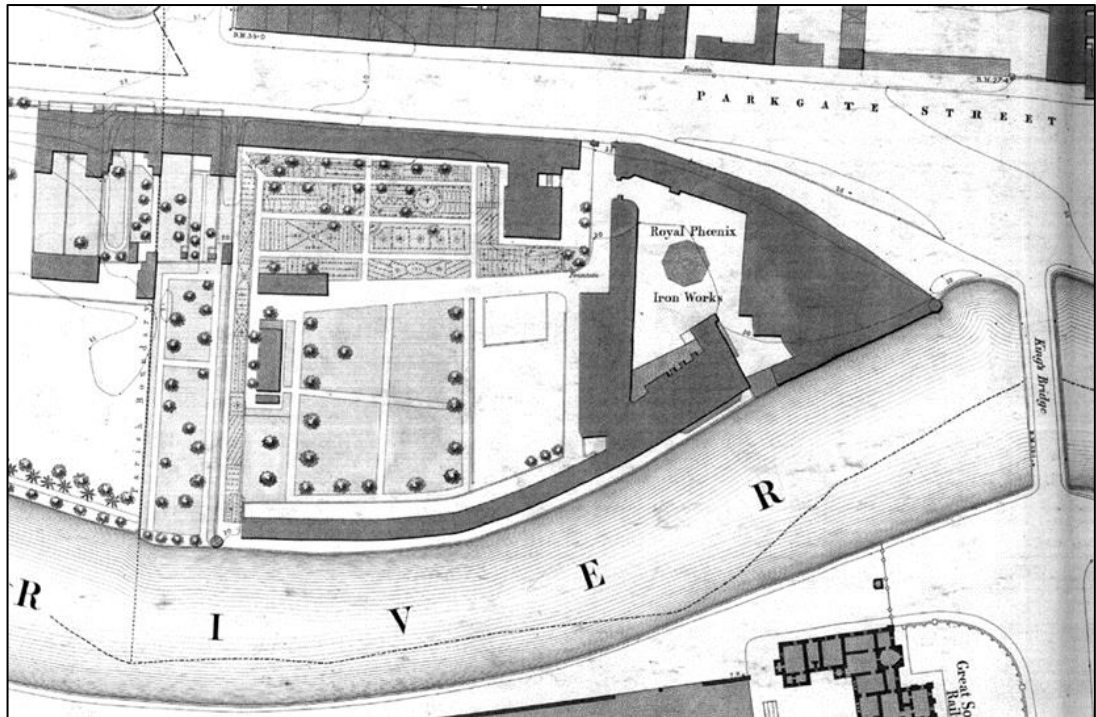


Figure 12.6: Extract from the Ordnance map of 1864. The layout of the Royal Phoenix Ironworks is little changed from the 1847 map. This map provides more detail of the layout of the extensive gardens. ‘Kingsbridge’ House is clearly defined and is shown with buildings on Parkgate Street north of the house, separated from the house by a small yard on the north east.

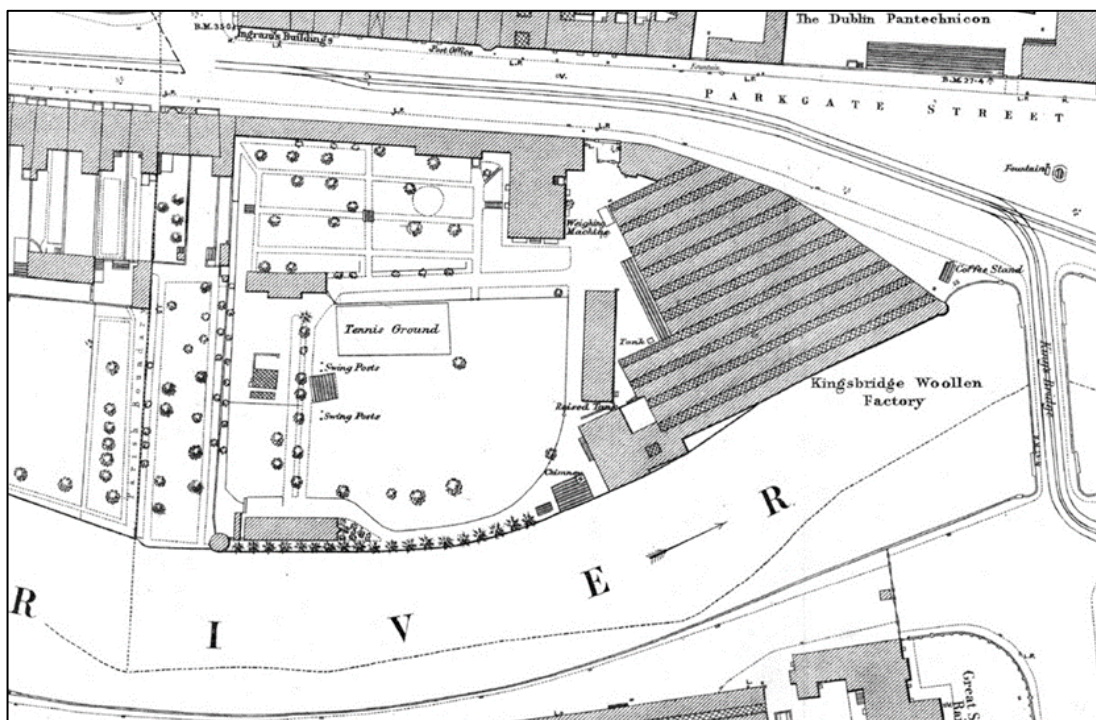


Figure 12.7: Extract from the Ordnance map of 1889. The layout of buildings on the east and south of the site has been completely changed. The present warehouse with its northlight roof is clearly defined on the map. The range of buildings near the River at the south west of the has been largely removed, and trees are shown at the River’s edge. From an auction advertisement in 1880, we know that the buildings to the north west along Parkgate Street are workers cottages. The entire is now titled ‘Kingsbridge Woollen Factory’.

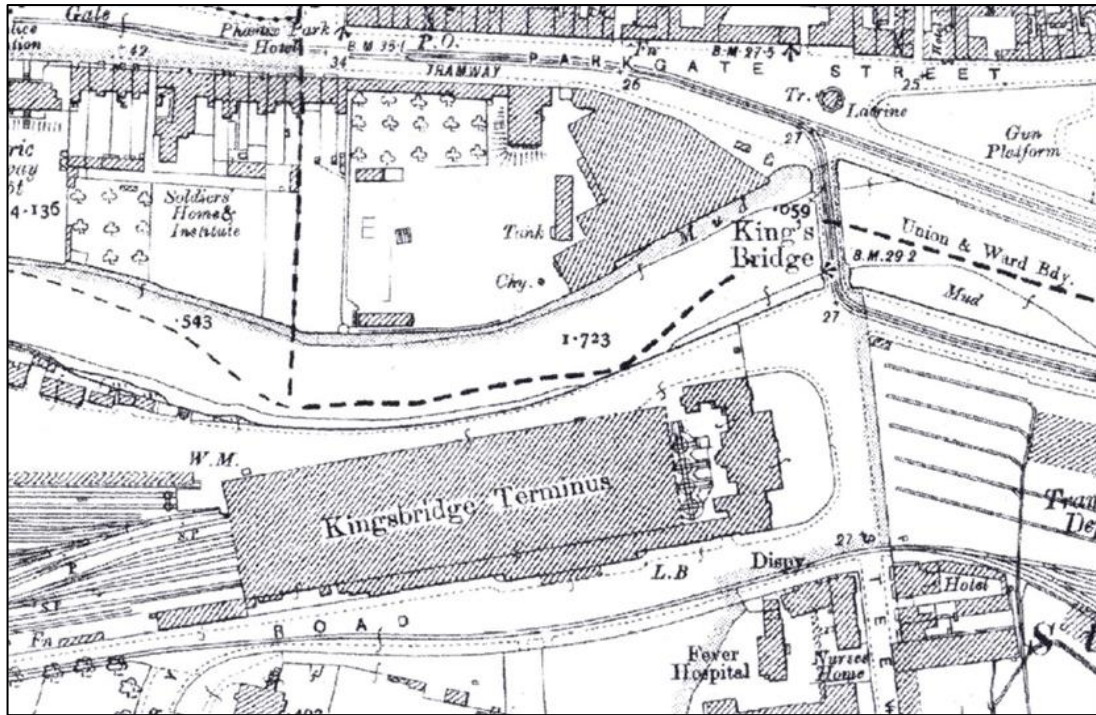


Figure 12.8: Extract from the Ordnance map of 1907. This map is at a smaller scale than the 1889 map, but shows little change in the layout since that time.

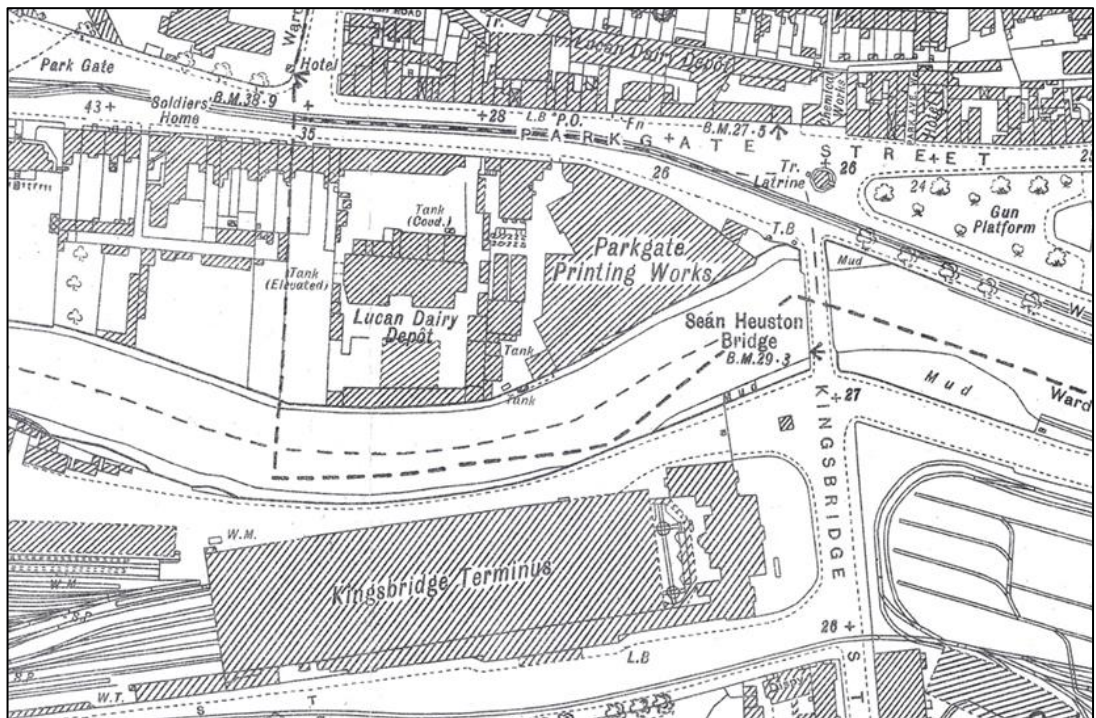


Figure 12.9: Extract from the Ordnance map of 1943. The premises is now the 'Parkgate Printing Works'. The western half of the original site is now shown separated from the eastern end and occupied by a depot for the Lucan Dairy. A number of buildings are shown south of 'Kingsbridge' House and buildings are also shown north of the house, between it and Parkgate Street.

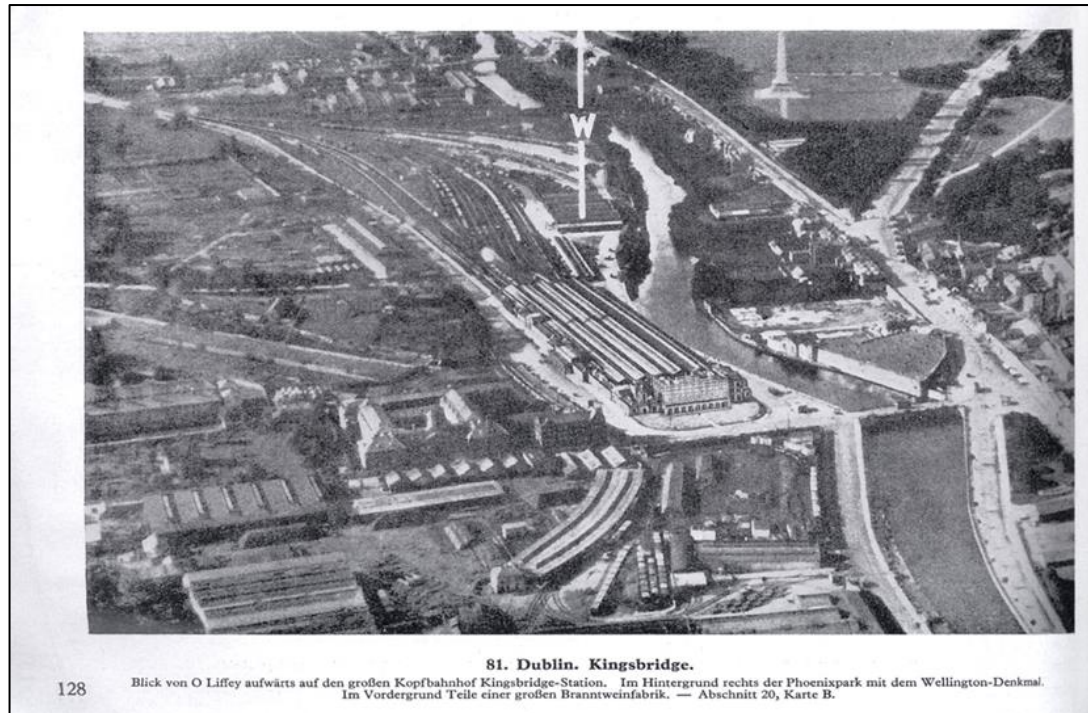


Figure 12.10: A somewhat enhanced aerial photograph of the Kingsbridge area from a booklet provided to Luftwaffe airmen during the Second World War as a guide to wayfinding. It will be noted that the western half of the 42A Parkgate Street site is shown clear of buildings. The eastern end of the site was occupied by Cahill Printers at the time.

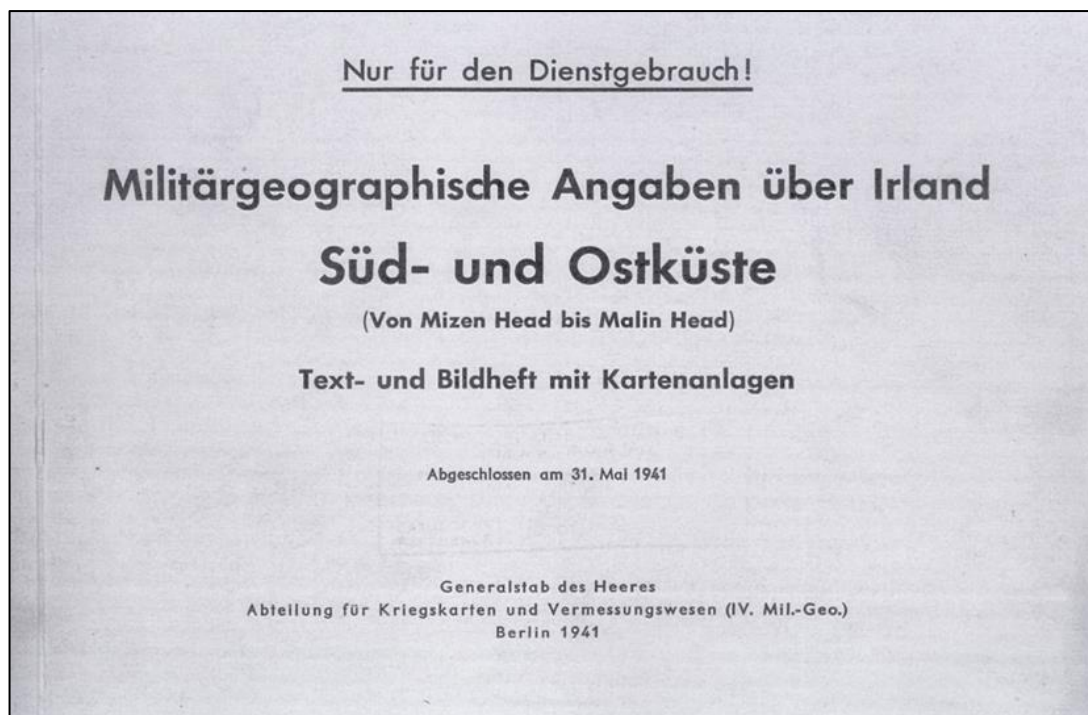


Figure 12.11: The cover of the Luftwaffe booklet, bearing the date 1941, though the date of the actual aerial photograph is probably somewhat earlier. A pilot colleague has indicated that the aerial photograph on the previous page was taken from quite a low altitude, probably around 1000 feet.

12.5 Potential effects on Architectural Heritage • protected Structures on the 42A parkgate street site

On the following pages, a brief description and assessment of likely effects on Architectural Heritage is provided in the case of each of the 4 structures listed in the Record of Protected Structures on the 42A Parkgate Street site. The wording of the Record in the Record of Protected Structures at Record No 6320 is as follows:

(43) Parkgate Street, Dublin 8

Former Parkgate Printing Works, now known as Parkgate House. Only the following structures are included in the Record of Protected Structures: (a) riverside stone wall; (b) turret at eastern end of site; (c) square tower on the riverfront; and (d) entrance stone arch on the Parkgate Street frontage.

No works to any of the protected structures on the 42A Parkgate Street site are proposed as part of the current application and so the existence of the proposed residential landmark building will not give rise to any direct effects on the architectural heritage of these structures.

The proposed residential landmark building, where visible from any of the protected structures, will be seen in the context of an extensive approved development on the larger western portion of the 42A Parkgate Street site.

The likely effects on the setting of architectural heritage in the wider surrounding urban area arising from this approved development, taken together with effects arising from a residential landmark building of an earlier design than that now proposed but of a similar scale, were assessed in Chapters 12 and 13 of a previous Environmental Impact Assessment Report that formed part of the documents lodged under An Bord Pleanála reference ABP-306569-20.

12.5.1 Riverside Stone Wall



Figure 12.12: Riverside Stone Wall

The wall is listed in the Record of Protected Structures as *(a) riverside stone wall*. It is also listed in the National Inventory of Architectural Heritage at Record No 50060349. The text of the NIAH description begins:

Boundary wall originally enclosing Phoenix Iron Works, erected c.1820. Composed of roughly coursed granite rubble with areas of brick repair, cement skirting over river bank. Terminated at east by round-plan turret in granite ashlar having cornice and blocking course. Shortened to west end terminated by brick and stone buildings.

The NIAH appraisal continues:

A well-constructed boundary wall, once forming part of the Phoenix Iron Works and related to Dublin's industrial history. The extent of the wall is much shorter than it was when originally constructed in the early nineteenth century, and only one of two attractive terminating circular piers now remains.

What is stated in the NIAH record is largely incorrect. Firstly, both the wall and the turret are built almost entirely of limestone, not granite. The way the wall abuts the east turret strongly indicates that the wall is later than the turret. Evidence from Ordnance mapping strongly indicates that there was never a continuous wall along the river bounding the Phoenix Iron Works, and so the wall is not a fragment of a much longer wall. Evidence also suggests that this wall is part of the 1880s reconstruction of buildings on the site, with numerous later changes to the wall; and so is not from circa 1820.

The quality of the stonework in the wall varies. There is good quality coursed rubble stonework at the eastern end of the wall, particularly towards the bottom of the wall, but the coursing tends to break down moving up the wall and towards the western end. Some of the wall is relatively crude random rubble work rather than coursed rubble. Parts of the wall tilt back away from the River. The greatest extent of this tilt is 160mm.

The dimensions of the coursed rubble stonework in the wall are unusual. Typically, horizontal courses – dayworks – would be about 18 inches high, some 460 mm. However, in the River wall, the courses are more frequent, varying between 380 mm and 400 mm. This could be an indication of the wall being built of stone reused from previous buildings on the site.

As part of the development on the western portion of the 42A Parkgate Street site approved under Register Reference ABP 306569-20, permission was granted to create new openings, including one very large opening in the Riverside Stone Wall. The purpose of the new openings is to provide open views south onto the River and towards Heuston Station from a new public plaza within the proposed scheme. The granted planning approval also provides for the enlargement of some existing openings in the wall, the carrying out of appropriate repairs to the Wall, and the lateral bracing from the wall to two proposed buildings Block A and Block B. No change to the approved works is proposed under the current application.

The Board's decision under ABP 306569-20 was a split decision and permission was refused under that decision for a residential tower at the east end of the site of the design as submitted under ABP 306569-20, referred to as Block A in that application. Given that original proposed Block A was refused under ABP 306569-20, lateral bracing from the Riverside Stone Wall to that building would not be possible. However, Board's decision under ABP 306569-20 specifically provides for:

- (c) Conservation, refurbishment, repair and adaption of existing protected structures, including:*
 - (ii) Riverside stone wall (protected structure) to be conserved, refurbished, repaired and adapted, including partial demolition comprising the enlargement of existing opes and creation of new opes*

and lintel treatments for incorporation within the riverside stone wall, as part of the proposed riverside amenity walkway.

As was proposed under ABP 306569-20 this ‘*conservation, refurbishment, repair and adaption*’ included all enabling and preparatory works to the Riverside Stone Wall to allow lateral bracing to be attached to that wall. In carrying out assessment of the likely effects on architectural heritage of the construction and existence of a new proposed residential landmark building of a different design to that previously proposed, it has been assumed that all works to the Riverside Stone Wall related to lateral bracing from that wall to any new building are works that are already approved under ABP 306569-20, and do not form part of the current application.

The existence of the proposed residential landmark building has the potential to contribute to placemaking in the new Heuston Quarter. In the text of SDRA 7 the Heuston Quarter is described as a potential ‘*western counterpoint to the Docklands*’. As is stated in Section 1.2 of the Development Plan: ‘*Place making is particularly important in the strategic development and regeneration areas*’ (SDRAs). Public space is central to placemaking, and the location of the proposed public plaza, at the foot of the proposed residential landmark building, and extending south west from it, offers the potential of celebrating the enjoyment of a relationship with the River Liffey and with the great public concourse in front of Heuston station. No other location for a public space on the 42A Parkgate Street site or, for that matter, anywhere else in the Heuston area, offers the same potential for relationships with both the River and the public space in front of Heuston Station.

The Heuston area is one dominated by the tumult of transport and traffic: trains, trams, trucks and taxis; buses and bicycles, scooters and segways. The proposed public plaza will be an island among all this bustle; a place of safety, a protected public space; a place made for pedestrians; a south facing space for public enjoyment not mediated by the ‘*roaring traffic’s boom*’; a space for looking out over the silent River. There is no other possible location for a public space in the Heuston area where the public can enjoy protection and yet be at the centre of all the activity of Dublin’s great western transport hub.

The circumstance of the location and potential of the newly consented public plaza is not just exceptional; it is unique. The existence of the proposed residential landmark building and of the consented public plaza will celebrate the Riverside Stone Wall and will greatly complement its setting, giving rise to positive effects on its architectural heritage.

12.5.2 Turret at eastern end of the 42A Parkgate Street Site



Figure 12.14: Turret at the eastern end of the site

This Turret appears on the First Edition Ordnance map of c.1837 as the eastern turret of a pair of turrets marking the eastern and western end of the river boundary of the Phoenix Ironworks. The western turret, located well west of the 42A Parkgate Street development site, was fully circular on plan. This turret may also have been fully circular when first built, but currently extends to only a little more than a semicircle. The Turret is listed by Dublin City Council in the Record of Protected Structures as one of four protected boundary features on the 42A Parkgate Street site.

The two walls that attach to it, the river wall and the curving grey painted brick wall on Parkgate Street, both date from the construction of the Kingsbridge Woollen Works in the mid 1880s and are, therefore probably some 75 years younger than the Turret. The NIAH mentions the two turrets as part of its assessment of the River wall, assuming the River wall and the Turret to be contemporary, which is not consistent with the mapping evidence.

The Turret is constructed in the main of cut limestone in an ashlar pattern. The cornice and blocking course are in granite. The Turret appears visually to be in relatively good condition though there is a need for some careful non aggressive stone cleaning, removal of plants, and minor stone and pointing repair.

The existence of the proposed residential landmark building close to the north west side of the Turret will create the consented riverside walkway behind the Turret and the Riverside Stone Wall and lead to the consented public plaza. The Turret will mark the eastern entrance into this walkway, resulting in the Turret gaining greater public prominence than it now enjoys. This has the potential to celebrate the Turret and give rise to positive effects on its architectural heritage.

12.5.3 Square Tower on the Riverfront

The Square Tower on the Riverfront first appears on the 1889 Ordnance map together with the small and large gabled industrial buildings immediately to the west of the Square Tower. All three are part of the Kingsbridge Woollen Works constructed by Edward C Guinness in the mid 1880s. The Square Tower is a protected structure.



Figure 12.15: Square Tower on the Riverfront – seen here to the right of the image

It can be noted from the steel brackets projecting from the tower and gabled buildings, and from the general relationship of these buildings with the River, that these buildings had a direct use in connection with the river. It would be important that, in their new uses as part of the proposed development, these buildings would retain uses directly connected with the River.

The Tower appears visually to be in relatively good condition though there is a need for some careful non aggressive stone cleaning, removal of plants, and minor stone and pointing repair. The assessment of the likely effects on architectural heritage of remedial works to the Square Tower was included in Chapter 12 of a previous Environmental Impact Assessment Report that formed part of the documents lodged under An Bord Pleanála reference ABP-306569-20.

The proposed residential landmark building, where visible from or seen in conjunction with the Square Tower, will be seen in the context of an extensive approved development on the larger western portion of the 42A Parkgate Street site, including large approved buildings immediately to the north of the Square Tower. Given this context, the existence of the proposed residential landmark building is assessed as having the potential to give rise to 'slight' effects on the setting of the Square Tower.

12.5.4 Entrance Stone Arch on the Parkgate Street Frontage

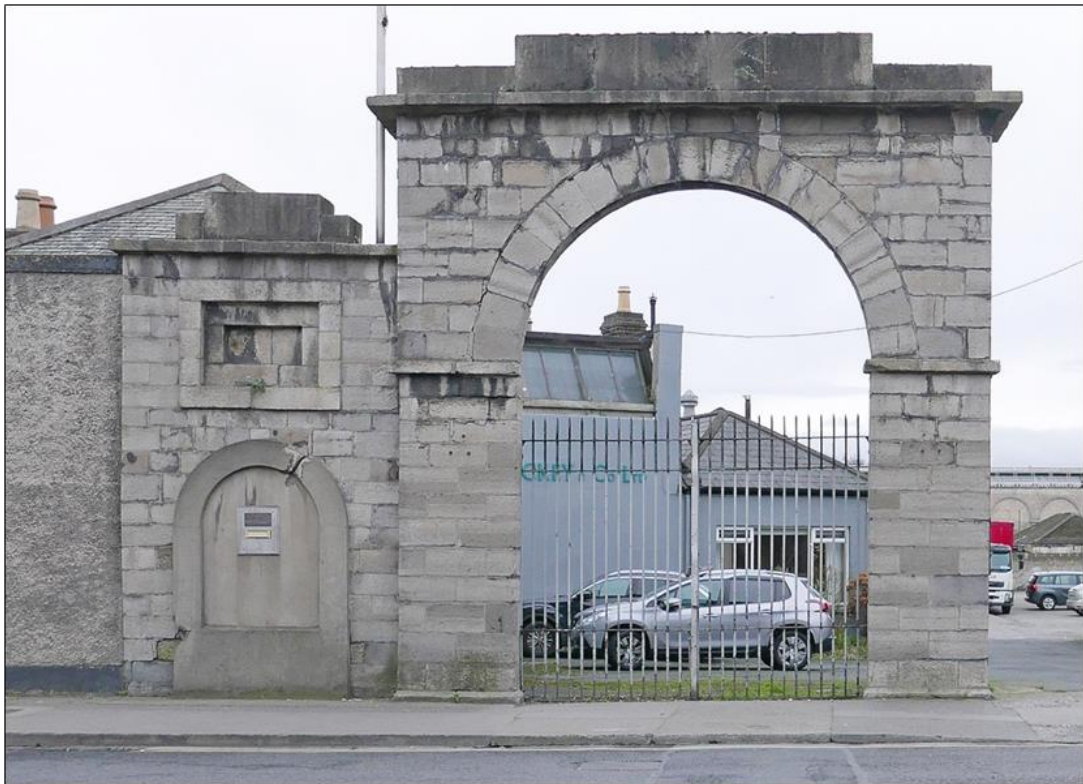


Figure 12.16: Entrance Stone Arch on the Parkgate Street Frontage

The Phoenix Ironworks were established by Richard Robinson in 1808. It is likely that the entrance gateway dates from a little later. The gateway is listed in the National Inventory of Architectural Heritage at Record No 50060346. The NIAH record begins:

Attached arched granite gateway, formerly to Phoenix Iron Works, built c.1820. Formerly symmetrical, comprising double-height arched entrance with lower flanking wings. Only eastern wing remains. Walls are tooled ashlar granite throughout.

The gateway is constructed mainly of limestone, not granite, though there are granite details. There is a rendered area in the western flank of the gateway that would suggest that it was intended to be symmetrical, but the evidence of Ordnance mapping would suggest that there was never a western wing to the gateway. The rendered area in the eastern wing wall covers granite dressed stonework in a distressed condition, surrounding a former round headed opening that perhaps gave into a building behind.

The Entrance Arch shows significant evidence of stone damage, particularly to the granite detail, and is in need of repair. The assessment of the likely effects on architectural heritage of remedial works to the Entrance Arch was included in Chapter 12 of a previous Environmental Impact Assessment Report that formed part of the documents lodged under An Bord Pleanála reference ABP-306569-20.

The proposed residential landmark building, where visible from or seen in conjunction with the Entrance Arch, will be seen in the context of an extensive approved development on the larger western portion of the 42A Parkgate Street site, including large approved buildings immediately surrounding the Entrance Arch. Given this context, the existence of the proposed residential landmark building is assessed as having the potential to give rise to 'slight' neutral effects on the setting of the Entrance Arch.

12.6 Potential effects on Architectural Heritage • Surrounding Area

12.6.1 Potential Effects • Construction Phase

The construction of the proposed development will give rise to the extent of effects on the setting of architectural heritage of the surrounding area that might be expected from any large construction project, including the normal effects on setting associated with hoarding, tower cranes, construction traffic and emerging and unfinished structures. Having regard to the general nature of the construction works as described above and having regard to statutory planning policy for the densification of the urban area, it is considered that the potential effects on the setting of surrounding architectural heritage arising from the proposed development during the construction phase will be 'slight' to 'moderate' in extent under a worst case scenario. The character of effects on setting during the construction phase is likely to be wholly negative at first, becoming neutral to positive as work proceeds and the new structure becomes apparent. There will be no direct physical effects on surrounding architectural heritage.

12.6.2 Potential Effects • Operation Phase

The scale of the proposed development and its prominent location in the city will mean that its existence is likely to result in very substantial changes in the visual character of the immediate area surrounding the development and less substantial changes in the visual character of areas of the city even at some remove from the site of the proposed development. These visual changes will give rise to effects on the architectural heritage character of the surrounding area and on the setting of heritage structures. Visual effects on the surroundings are more fully described in Chapter 13 of this EIAR under the heading of Landscape and Visual Effects.

The character of effects, positive negative or neutral, will depend on the response of the individual observer. The development is intended to have a positive role on providing legibility in the City in response to policies expressed in the *Dublin City Development Plan 2016-2022*.

12.6.2.1 Indirect Effects

Indirect impacts are defined in the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency (Draft of 2017) as follows:

Impacts on the environment, which are not a direct result of the project, often produced away from (the site) or as a result of a complex pathway.'

These are sometimes referred to as 'secondary impacts'. One example of an indirect impact would be deterioration of water quality due to soil erosion following tree clearance for a leisure development on a woodland site. In this case the tree removal is a direct impact and the effects of the erosion are indirect impacts.

This assessment has been undertaken on the basis that all reasonably foreseeable changes likely to occur as a result of the proposed development will result from the development as described in more detail in Chapters 3 and 4 of the EIAR. As such, any effects over and above those described above are not envisaged.

It should be noted that effects of proposed development on the on the architectural heritage character of the surrounding area and on the setting of heritage structures are often considered to be indirect effects (e.g. changes to the visual environment may be considered to result in indirect effects on archaeology, architectural and cultural heritage.)

12.6.2.2 Cumulative

The proposed residential landmark building will be seen in the context of an extensive approved development on the larger western portion of the 42A Parkgate Street site. The existing approved

development and the proposed residential landmark building, taken together are likely to give rise to greater effects on architectural heritage than either development would individually. The architectural heritage effects of the approved development together with a residential landmark building of an earlier design than that now proposed but of a similar scale were assessed in Chapter 12 of a previous Environmental Impact Assessment Report that formed part of the documents lodged under An Bord Pleanála reference ABP-306569-20.

12.7 Do Nothing Scenario

If the proposed development does not proceed, the site of the proposed development will remain as it is, and the effects described in this chapter will not occur.

12.8 Mitigation Measures and Monitoring

12.8.1 Mitigation

12.8.1.1 Mitigation During Construction

It is noted that Condition 23 of the An Bord Pleanála grant under ABP 306569-20 sets out requirements in relation to how works to historic structures on the wider 42A Parkgate Street site should be carried out and in relation to how historic structures, features and fabric should be protected during any works.

12.8.1.2 Mitigation During Operation

The subject application proposes the development of site designated as a Strategic Development and Regeneration Area under the *Dublin City Development Plan 2016-2022*, in order to accommodate medium and high density residential development. In these circumstances, during the construction or operational phases scope for mitigation measures is limited.

12.8.2 Monitoring

No monitoring has been proposed with respect to effects on architectural heritage from of the proposed development.

12.9 Residual Effects

12.9.1 Residual Effects During Construction

As no mitigation measures in addition to those provided for by Condition 23 of the An Bord Pleanála grant under ABP 306569-20 are now proposed, the residual effects of the proposed development on architectural heritage will be as described under Sections 12.5 and 12.6 above. Cumulative effects have also been considered.

12.9.2 Residual Effects During Operation

As no mitigation measures are now proposed, the residual effects of the proposed development on architectural heritage will be as described under Sections 12.5 and 12.6 above. Cumulative effects have also been considered.