

**BALSCADDEN SHD:
LANDS AT BALSCADDEN
AND FORMER BAILY COURT HOTEL
MAIN STREET,
HOWTH
CO. DUBLIN**

**ARCHITECTURAL HERITAGE
IMPACT ASSESSMENT**

15th March 2022

**Historic Building Consultants
Old Bawn
Old Connaught
Bray**

940/03

Contents

Contents	2
Introduction.....	3
Scope and purpose	3
Site and its environs	4
Methodology	6
Guidelines	6
Sources of Information to inform the Assessment.....	7
Site inspection.....	7
Historical background	8
Conservation context.....	14
Record of Protected Structures.....	14
Conservation areas.....	14
National Inventory of Architectural Heritage.....	14
Application site	16
Proposed development	19
Assessment.....	20
Sensitive elements in the vicinity	20
Baily Court Hotel	20
Howth Martello Tower	21
Martello tower and St Mary’s Abbey.....	29
Architectural Conservation Area.....	30
Balscadden Road.....	31
Proposed buildings	32
Block A.....	32
Block B.....	32
Block C.....	33
Block D.....	33
Assessment.....	34
Development plan policies	36
Conclusions	37
Bibliography.....	38
Appendix – Conservation guidelines	39
Architectural Heritage Impact Assessments.....	39

Introduction

This report has been prepared for Balscadden GP3 Limited as part of the documentation to be submitted with a planning application.

The development will consist of:

The proposed development relates to lands located to the south of the Martello tower on Balscadden Road & the former Baily Court Hotel, Main Street, Howth, County Dublin. The development will consist of the demolition of existing structures on the proposed site including the disused sports building and the former Baily Court Hotel buildings and the construction of a residential development set out in 4 residential blocks, ranging in height from 2 to 5 storeys to accommodate 180 apartments with associated internal residential tenant amenity and external courtyards and roof terraces, 1 retail unit and 2 café/retail units. The site will accommodate car parking spaces at basement level and bicycle parking spaces at basement and surface level. Landscaping will include new linear plaza which will create a new pedestrian link between Main Street and Balscadden Road to include the creation of an additional 2 new public plazas and also maintains and upgrades the pedestrian link from Abbey Street to Balscadden Road below the Martello tower. Please see the accompanying statutory notices for a more detailed description.

The site was inspected for the purposes of preparing this report on 28th June 2021 and 16th November 2021, on which occasions the photographs incorporated in the report were taken and the site examined to prepare the descriptions contained therein. Some archive photographs are also included.

Historical research was carried out on the background history of the property and its vicinity, and the results are set down below.

Scope and purpose

The scope and purpose of this report is to assess the potential impacts of the proposed development on architectural heritage. In particular, it examines the possible impacts on the character and setting of protected structures in the vicinity and on the Howth Historic Core Architectural Conservation Area.

While this report contains comment on aspects of the condition of the buildings it is not a condition report or a structural report and must not be read as such.

This report has been prepared by Rob Goodbody BA(mod), DipEnvPlanning, DipABRC, MA, MUBC, MIPI.

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Site and its environs

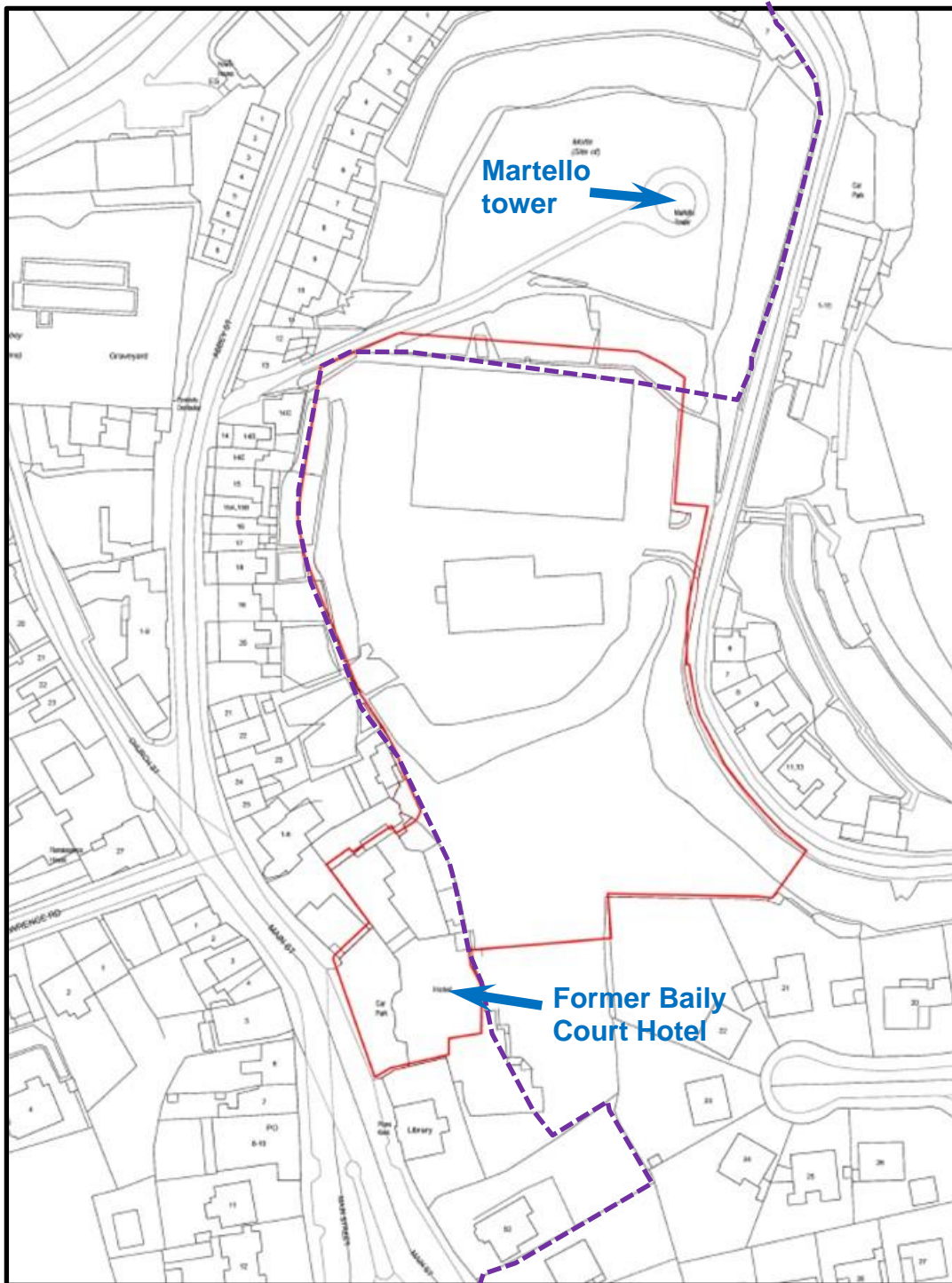


Figure 1: Location of site

In the map above the application site is outlined in red. The broken purple line shows the approximate location of the eastern boundary of the Howth Historic Core Architectural Conservation Area for guidance purposes only – for the official boundary see Fingal Development Plan 2017-23, map sheet 10.

The application site lies to the east of Main Street and Abbey Street, Howth and to the west of Balscadden Road. The land between those two roads rises to a height above the prevailing ground, representing the remnants of an esker formed during the ice age and the hill is formed with sand and gravel. At the northern end of this promontory a Martello tower stands in a strategic location overlooking the harbour and Balscadden Bay. The tower is surrounded by an area of relatively level ground, beyond which it falls away sharply in all directions.

To the south of the Martello tower and its grounds the steep slope falls away into the application site, where there is a sports pavilion and the flat ground that was formerly used as a sports pitch. It is likely that this lower ground is the result of quarrying in the past. To the south of the sports facilities the ground within the application site rises again to a level similar to the ground on which the Martello tower stands.

The eastern boundary of the site is bounded by Balscadden Road, which curves along the margin of the site. This road was cut out of the hillside in 1810 and the slope above it is not a natural feature.

To the south of the application site lie the grounds of houses in Asgard Park and an area of land associated with number 60 Main Street, Howth.

The western side of the application site includes the now derelict former Baily Court Hotel with its stable yard and outbuildings that lie to the north of the hotel. This is the only part of the application site with a street frontage to Main Street. The remainder of the western boundary of the site runs along the rear of properties in Main Street and Abbey Street and the site is on higher ground than the buildings on those properties.

Methodology

The assessment of architectural heritage has been conducted under the relevant legislation and planning frameworks applicable to the Republic of Ireland. These include:

- The Planning and Development Acts 2000 to 2021
- Heritage Act, 1995, as amended
- National Monuments Acts, 1930-2004
- The Planning and Development (Strategic Infrastructure) Act, 2006
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999

The project is located entirely within the administrative area of Fingal County Council and the relevant policies relating to the area are contained within the Fingal Development Plan 2017-2023, in particular, section 10.3 of the plan that addresses architectural heritage.

Guidelines

The preparation of an architectural heritage impact assessment is carried out in the context of the *Architectural Heritage Protection Guidelines for Planning Authorities* published by the Department of the Environment, Heritage and Local Government in 2004 and reissued by the Department of Arts, Heritage and the Gaeltacht in 2011. These guidelines still represent professional best practice. The main thrust of the guidelines relates to works to protected structures, though they are also relevant to projects such as the present proposal, where there are no protected structures on the site but there is an architectural conservation area the vicinity as well as protected structures and the potential impact of the development on these may be properly assessed.

The section of the guidelines that addresses development control contains the following paragraph:

6.4.15 For more extensive or complex works with a potential to have a major impact on the architectural heritage, a planning authority may require an applicant to submit a more detailed impact statement. This may be necessary to allow the planning authority to assess the full implications of the proposals and allow an informed decision to be made on the appropriateness of the development. An outline of the type of information that could be included in such an architectural heritage impact assessment is found in Appendix B of these guidelines.

This paragraph relates mainly to more extensive or complex works to a protected structure but is taken in this report to be of relevance in view of the extent of the proposed development.

The guidelines do not determine the extent of a study area that is to be adopted in assessing the potential impact of a building development on architectural heritage. The *Guidelines for the Assessment of Architectural Heritage Impacts on National*

Roads Schemes published by the National Roads Authority (now TII) proposes that the width of the study area for architectural heritage in the case of national roads schemes should be 50 metres either side of the centre line of the new road but extending further where professional opinion considers that a wider area would be warranted. This approach has not been adopted in this report as it is considered that it is of more relevance to consider the potential impact of the proposed development when it would be seen in proximity to any protected structure or architectural conservation area.

The guidelines are discussed further in the appendix.

Sources of Information to inform the Assessment

The identification of buildings and structures to be assessed for impact was based in the first instance on an analysis of current Ordnance Survey maps. The potential for any building or other structure in the vicinity of the proposed development to have special architectural significance was also gauged through examination of the following sources:

- Fingal Development Plan 2017-2023
- Pre-Ordnance Survey maps by John Rocque, John Taylor and William Duncan
- Ordnance Survey six-inch maps of 1843, 1871 and 1909
- Ordnance Survey 1:2500 maps of 1907
- National Inventory of Architectural Heritage, www.buildingsofireland.ie
- Historic Environment Viewer, <https://maps.archaeology.ie/HistoricEnvironment/>
- Google Earth Pro

Site inspection

The site and its vicinity have been inspected on a number of occasions and for the purpose of preparing this report was visited on 28th June and 16th November 2021. The interior of the former Baily Court Hotel was examined as far as it was safe to do so on the latter date and it had previously been inspected by the present author in 2012 when more of the interior was accessible.

The findings of the site inspections informed the writing of the report.

Historical background



Figure 2: Detail of Rocque's map of the Environs of Dublin, 1760

The town of Howth is of medieval origin, and there are records of its use as the origin and destination of shipping in the fourteenth century. It was probably more used as a fishing harbour, however, and for this purpose it has remained significant since those early times. The early harbour was little more than an anchorage in the lee of a shoal of rocks that projected northwards from a headland, on which a medieval fort or castle was built. John Rocque's map of county Dublin, published in 1760, shows the town with a quay, rather than piers, at the harbour.

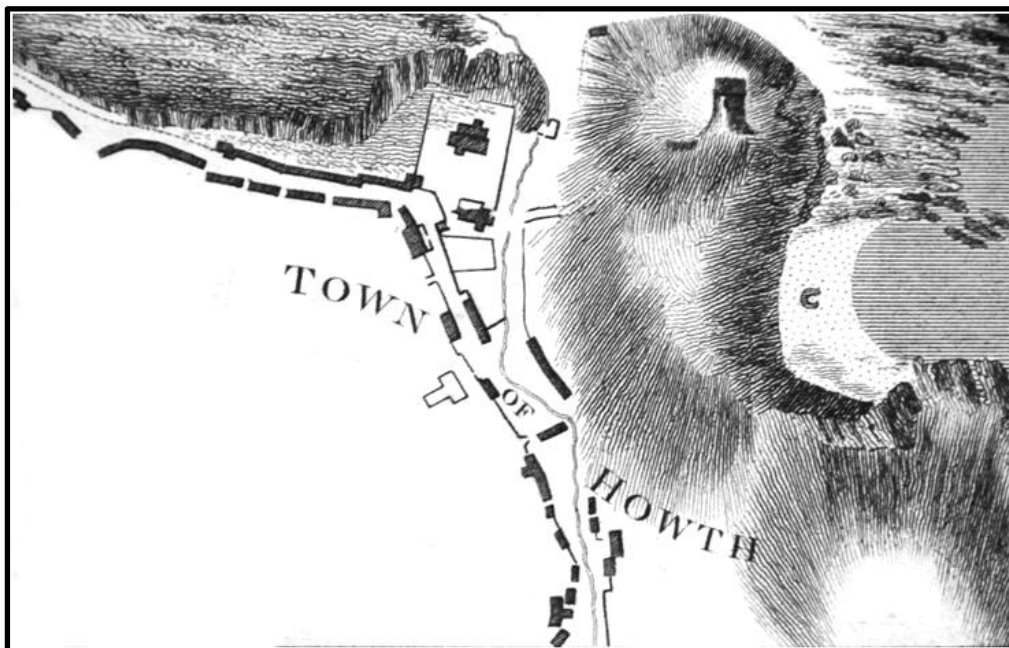


Figure 3: Detail of map of Howth of 1810

A more detailed map of the town was produced in 1810, as seen in figure 2, reproduced above, and it shows how it was laid out before the construction of the harbour. At that time there were no buildings along the shoreline. The town was approached from the west along Dunbro Hill and Church Street, while Abbey Street ran down to the water's edge with no buildings alongside it. To the east of the town the site of the medieval fort had become the location for the Martello tower that was built in 1804-05 to protect the landing place at the harbour from a potential attack by French forces.

The construction of the harbour had commenced in 1807 but had come to a halt for a time in 1809 due to concerns about the design and construction of the piers. By that stage the eastern pier had been partially built. John Rennie was taken on as the engineer on the project and altered the scheme significantly. Amongst the changes made by John Rennie was the type of stone to be used in the construction and he opened up a quarry at Kilrock, to the east of the harbour, as a source of quartzite to be used as the rubble core of the piers. To bring the stone down Rennie designed a railway and a platform was carved out of the side of the cliffs to accommodate this railway. Rennie's map showing this railway is reproduced below and the line of the railway is now Balscadden Road. At the lower end of the railway, after it turns towards the north-east, the route is steep and wagons loaded with stone were lowered down this section on chains, using a system known as an *inclined plane*, as horses could not haul heavy wagons down such a steep slope.

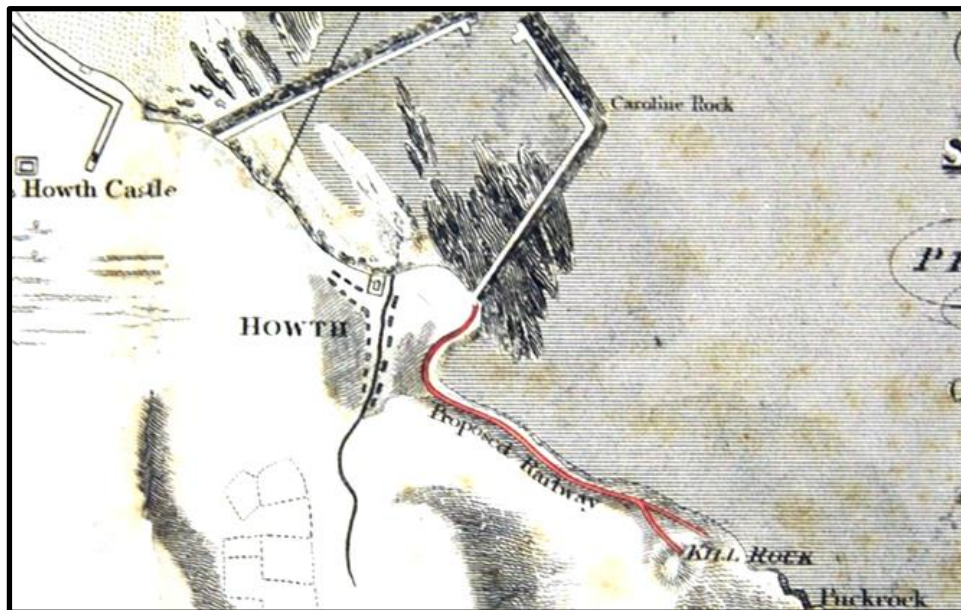


Figure 4: Rennie's plan for a railway, 1810

By 1816 the project was almost complete and was shown on John Taylor's map of the Environs of Dublin, published in that year, as seen in the map extract reproduced above. The difference between the way that Taylor showed the harbour and how it is in reality is an indication that his map was published before the harbour was fully completed. By this stage, however, Harbour Road and the railway along what was to become Balscadden Road had been laid out, and although the layout of the town and its buildings had changed little since 1810, the process of change was clearly under way.

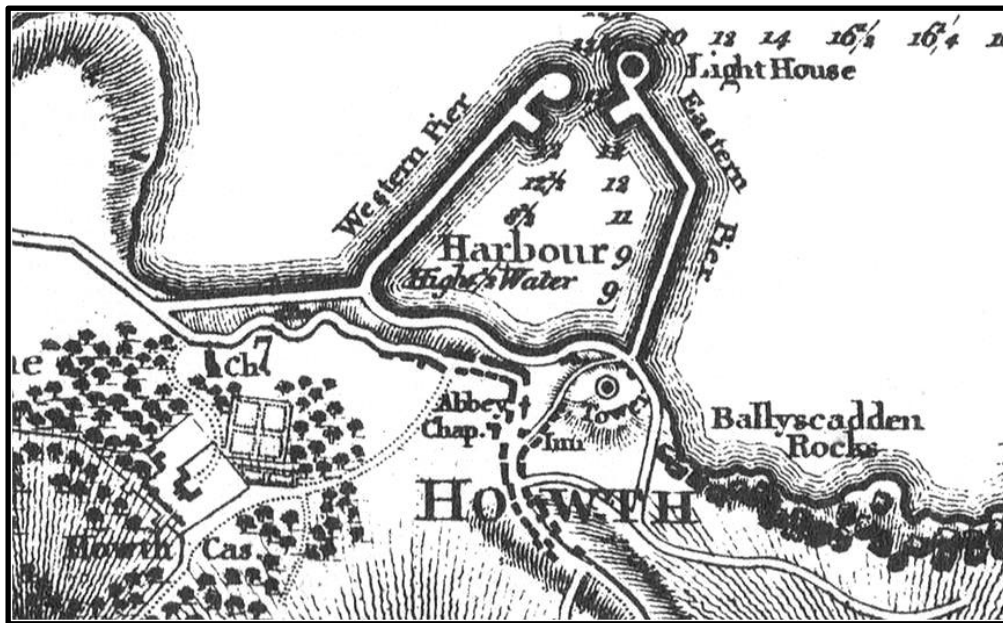


Figure 5: Detail of John Taylor's map of Dublin, 1816

Most significantly, Taylor showed the inn on the eastern side of Main Street. Howth was built as a harbour for mail packet boats, which were small sailing ships at the time that the harbour was designed. The first steamship to cross between Britain and Ireland made the journey in 1816 and in a very short time the carriage of the mails was being undertaken by steamships. Hotels were of vital importance at any port that catered for passenger ships in the days of sail, as it was usually necessary to wait for suitable weather conditions before a ship could sail, and this could extend to several weeks. Even with a single day's delay the passengers would expect to have a good quality hotel in which to await the decision to sail and it is no surprise that a hotel was provided in Howth as soon as the packet boats began to run from the harbour.

The name "Royal Hotel" was probably adopted in August 1821 when king George IV arrived in Howth. He did not visit the hotel, however. His arrival in Howth was unexpected, as the royal yacht was supposed to have landed at the Pigeonhouse, whereas the king took the mail packet instead and landed at Howth. From Howth harbour he was taken directly by carriage to the viceregal lodge in the Phoenix Park and did not spend any time in Howth.

The Royal Hotel changed hands a number of times over its first two centuries. In the 1830s it was McDowell's Royal Hotel, and by the early 1840s it was being run by Patrick McKenny, whose family ran the hotel for the rest of the century. In about 1900 the hotel was acquired by Findlaters', the well-known Dublin family of grocers, brewers, distillers and hoteliers. The family also owned the St Lawrence Hotel in Howth, and a few years later the firm opened one of its chain of grocery shops in Main Street, Howth. One of the sons of the family, William Findlater, managed the hotel for a time, after which it was managed by Mrs Fairweather and then Miss Kearns. The hotel was back in the hands of the McKenny family in the later 1920s before being acquired by James Gibney and his wife.



Figure 6: Detail of first edition Ordnance Survey map, 1843
Dublin sheets 15 and 16

The first edition Ordnance Survey map of the Howth area was published in 1843 and showed the hotel as it was at that time, denoted by the arrow. The scale is relatively small, at six inches to the mile, and is enlarged in the extract reproduced above. This shows the main hotel building with a small projection on the southern side, towards the rear of the building. At this scale it is not possible to tell where one building ends and the next begins, but there appears to be a continuous range of buildings stretching to the north from the hotel until it meets the large building that projects further into the main street. The open area to the north of the hotel to the north of the main building and to the east of the main street is probably the stable yard of the hotel, given that it had been advertised as having livery stables associated with the hotel use. Beyond this, to the north, the ground is open, though the map does not convey any impression of the contours, except through a number of spot heights, noted in feet above sea level.



Plate 1: Royal Hotel in about 1900

The photograph above shows the hotel as it was at the time and as it was through much of the nineteenth century, as a hotel with livery stables, presumably in the yard to the left of the main building, behind the two-storey house. There is a two-storey building to the left, but no attached building to the right. The porch to the front is visible. The facade is rendered, with a raised area around the windows simulating stone quoins. A similar pattern is visible around the windows of the adjacent two-storey building, suggesting that it was in the same ownership, which is consistent with its location between the main building and the stable yard.

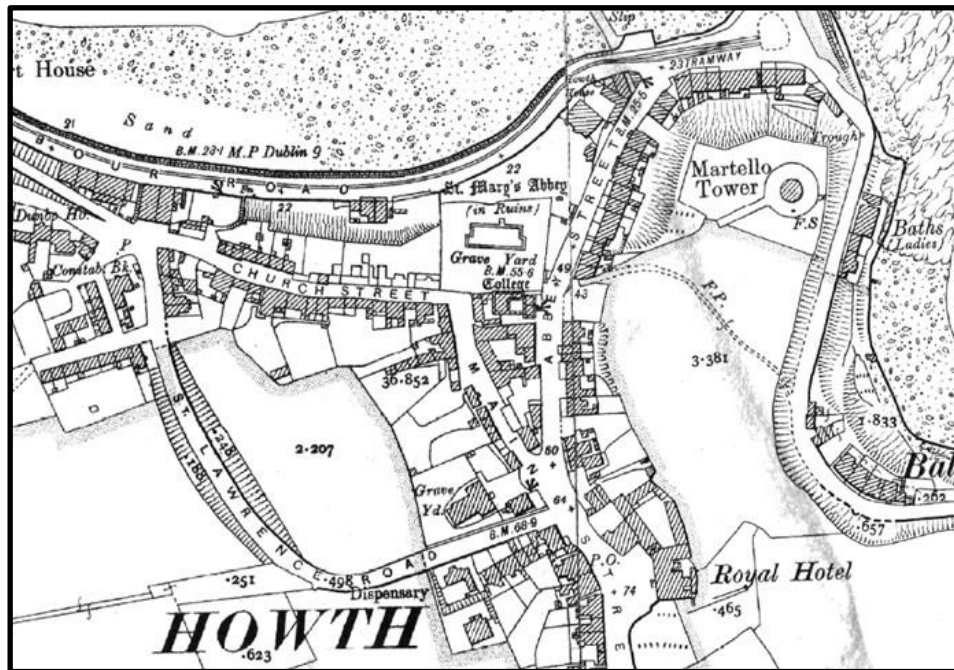


Figure 7: Ordnance Survey map of 1907 showing Royal Hotel Dublin sheets 15-16 and 16-5

A larger scale map was published at a scale of 1 : 2500 in 1907 and this is reproduced above. The larger scale allows for a greater amount of detail, and a porch may be seen at the front of the building. There is no projection on the southern side of the main hotel, while the buildings to the north include the stable yard with an archway through the building on the frontage to the yard at the rear. Beyond the hotel to the north the rising ground is still open, through to the Martello tower on the high ground overlooking the harbour. As with the earlier map, no indication is given as to the slope of the ground, other than the markings to the north, east and west of the Martello tower showing the steep fall of the ground in those locations, with no hint of the drop in the ground to the south of the tower, or the climb back up towards the hotel.

During the twentieth century the hotel was enlarged on a number of occasions. The rateable valuation through that century had been £26-15s-0d, but at the beginning of the twentieth century, when William Findlater was in charge, the valuation was increased to £39-10s-0d, and it increased again in the 1920s to £60, suggesting that there were improvements at those times. A major and sustained programme of enlargement took place under the proprietorship of the Gibneys, particularly when Mrs Gibney was in charge from the mid-1940s. The valuation

went up to £81-5s-0d by 1945, £101-5s-0d by 1948 and £151-15s by 1954. This coincided with a boom in tourism from the end of the Second World War, mainly arising from Britain, where food rationing was still in force until the early 1950s and many people opted for holidays in Ireland where food was plentifully available. Rationing came to an end in Ireland in 1951, while meat was still rationed in Britain until July 1954.

The Royal Hotel had survived the transition from sailing ships to steamships by catering for those for whom Howth was their holiday destination. This is shown in *Black's Picturesque Tourist Guide to Ireland*, published in 1855 had this to say of Howth:

Having become a sea-bathing station, a few more comfortable and commodious houses have sprung into existence of late, and the Royal Hotel, which is well conducted, affords good accommodation to casual visitors.

More recently the name of the hotel was changed to the Baily Court Hotel, and it closed for business in about 2007.

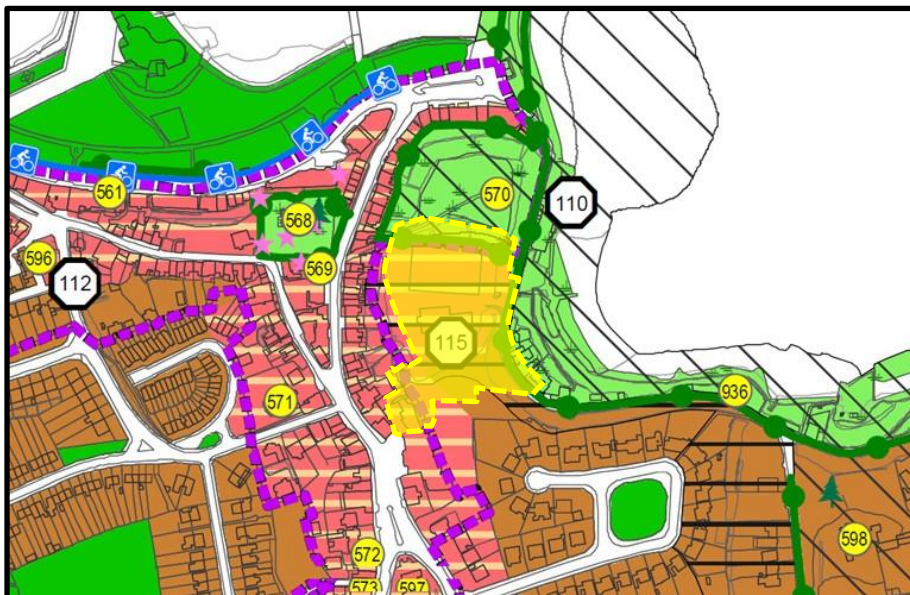
The Martello tower was one of the first to be relinquished by the military. In 1852 the first telegraph cable was laid between Great Britain and Ireland, coming ashore at Howth, where the Martello tower acted as the receiving station. Telegraph was succeeded by radio, when the tower was used for demonstrations of transmissions between Howth and Holyhead in 1903 and 1905. The tower remained in the ownership of successive telecommunications operators until the late 1980s, when it was sold to the county council. It is now "Ye Olde Hurdy-Gurdy Museum of Vintage Radio", dedicated to communications heritage.

Conservation context

Record of Protected Structures

The application site lies within the administrative area of Fingal County Council. The Record of Protected Structures for Fingal is set down in the Fingal County Development Plan 2017-2023. The Baily Court Hotel is not included and hence is not a protected structure. There are no protected structures on the application site. The Martello tower, to the north of the application site, is a protected structure, as denoted by the yellow symbol carrying the reference number 570 on the map extract below. There are no other protected structures on the lands adjoining the application site. The Martello tower is also included in the Record of Monuments and Places under reference DU016-002002-.

Conservation areas



*Figure 8: Detail of Fingal Development Plan 2017-2023 showing Howth
Approximate extent of site outlined and shaded in yellow*

The map extract from the Fingal Development Plan 2017-2023 shows a broken purple line surrounding the town centre. This indicates the Howth Historic Core Architectural Conservation Area (ACA). The Baily Court Hotel is within the boundary of this ACA, while the ACA boundary runs along western and northern boundaries of the application site.

National Inventory of Architectural Heritage

The National Inventory of Architectural Heritage (NIAH) included Fingal amongst its surveys during 2005 and the results have been published. The Baily Court Hotel was amongst the buildings surveyed, reference 11359019. It was assigned Regional rating for its Architectural and Artistic interest. The Howth Martello tower

is also included within the NIAH, reference 11359033 and was assigned a National rating.

The NIAH Handbook defines its Regional rating as:

Structures or sites that make a significant contribution to the architectural heritage within their region or area. They also stand in comparison with similar structures or sites in other regions or areas within Ireland. Examples would include many Georgian terraces; Nenagh Courthouse, Co. Tipperary; or the Bailey Lighthouse, Howth. Increasingly, structures that need to be protected include structures or sites that make a significant contribution to the architectural heritage within their own locality. Examples of these would include modest terraces and timber shopfronts.¹

At the time that this survey was carried out the NIAH recorded only a description of the building, with some other criteria, while in later surveys carried out elsewhere the record included an appraisal of each structure. No appraisal was included for the Baily Court Hotel. The hotel was still in use at the time, while it is derelict now. The description given in the 2005 survey was:

Semi-detached three-bay three-storey double-pile former house, c.1800. Two-bay three-storey extension, c.1850, to south-east corner. Projecting bow to ground floor, c.1990. Two-bay two-storey extension to south-west corner, c.1995. Now in use as hotel. ROOF: Double-pitched behind parapet; double-pile; replacement fibre-cement slate, c.1990; concrete ridge tiles; nap rendered chimney stacks; clay pots; concrete coping; upvc rainwater goods; flat-roof to bowed projection. WALLS: Nap rendered; painted. OPENINGS: Square-headed window openings -tripartite to upper floors; concrete sills; original 2/2 and 6/6 timber sash windows to first floor; replacement upvc casement windows, c.1990, to second floor; replacement timber casement windows, c.1990: rope moulded pillars with cast-iron dressings; tripartite door opening to right; round-headed door opening to centre; square-headed flanking door openings; glazed timber panelled doors; fanlight.

It is unlikely that the building was formerly a house, and it is probable that it was built in about 1818 when the harbour was completed and mail ships began to operate on the route to Holyhead, carrying passengers and mails.

¹ NIAH Handbook, 2017 edition, Department of Culture Heritage and the Gaeltacht, p. 20.

Application site

The application site lies to the east of the village of Howth and to the west of Balscadden Bay. To the north lies the Howth Martello tower, which sits on high ground that falls away at cliffs to the west, north and east, while to the south the ground slopes steeply towards the application site.



Plate 2: Application site, seen from grounds of Martello tower

The site is in three sections. The northern part is in a hollow between the ground occupied by the Martello tower and the southern part of the site. This is seen in the photograph above, with the former sports pavilion building and the hard-surfaced ground to the front. The western part, towards the village, is seen at centre of the photograph below. The ground slopes down to the east to Balscadden Road and to the west towards the village of Howth. The central part is on higher ground, sloping steeply away at its eastern and western margins. This is seen in the middle distance in the photograph above, beyond the lower ground on which the building stands.



Plate 3: Grounds of Martello tower, with site beyond



Plate 4 : Baily Court Hotel

The south-western part of the site lies along Main Street and Abbey Street and is occupied by the Baily Court Hotel, which is a complex of buildings and is now vacant and boarded up. The main hotel building is three-storey and three-bay, with a single-storey, flat-roofed section to the front. This is flanked by two-storey elements, beyond which, to the north, is a range of single-storey structures. To the north of the hotel building is a stable yard



Plate 5: View northwards towards site and hotel

The hotel is set back from the carriageway by an area of parking. To the rear the ground rises steeply to the higher, southern, portion of the application site.



Plate 6: Interior of Baily Court Hotel, 2021

The interior of the hotel was examined in 2012 and it was found that a great deal of the interior fit-out dated from the mid- to late-twentieth century. Original cornicing remained in limited areas on the first floor, along with shutters and architraves, though throughout the rest of the building the features were of later date. Extensive water penetration had occurred at that time and there were extensive signs of resulting damage, including staining indicative of significant quantities of water in the walls, while fruiting bodies of fungal attack were also evident, including in original cornicing. On a return visit in 2021 the building was found to be very extensively damaged and was largely too dangerous to allow examination beyond a limited area.



Plate 7: Stable yard to north of hotel

The stable yard has the shells of buildings, without roofs, on the eastern side, while on the western side there is a two-storey range of buildings mainly constructed of rubble stone, but with some areas where walls are of concrete blockwork.

Proposed development

It is proposed to develop the site to provide residential accommodation with tenant accommodation and retail and café use. To facilitate the development the existing buildings on the site would be demolished, including the former Baily Court Hotel.

The present site includes a substantial tract of land to the east and north-east of the former hotel and this would be included in the development.

As was noted in the site survey above, there are significant changes in level within the application site. From the northern end of the site, where it adjoins the site of the Martello tower, the ground falls away into a hollow, before climbing back up again towards the south, while the ground falls sharply away on both the eastern and western sides. The Baily Court Hotel is at a lower level than much of the rest of the application site, though it is relatively high up on the slope of Main Street.

The proposal would involve a significant degree of cutting into the ground to alter the levels, reducing them to ensure that the proposed development does not dominate the landscape. The buildings would vary in height, with three-storey buildings at the entry to the site from Main Street, to two/five-storey over a basement car park elsewhere within the site.

Assessment

In this assessment each of the potentially sensitive elements in the vicinity of the application site are examined to determine the possible effect of the development on their character or setting. This is followed by a discussion of each of the proposed buildings within the application site to assess the potential impacts each may have on the architectural heritage of Howth.

Sensitive elements in the vicinity

The assessment set out below commences with an assessment of the former Baily Court Hotel, which would be demolished, followed by an assessment of the potential impacts of the proposed development on the historic landscape of Howth, commencing with the adjacent Martello tower to the north of the application site, followed by the Howth Historic Core Architectural Conservation Area, Howth Abbey and, finally, a brief look at Balscadden Road.

Baily Court Hotel

The Baily Court Hotel was built in the early years of the nineteenth century as a hotel, intending initially to serve those who were availing of the cross-channel packet boats from the new harbour, which had commenced construction in 1807. It served as a hotel until about 2007 and has been vacant since the closure.

The present writer inspected the interior of the hotel in 2012 and observed that there was little left of the original internal features within the hotel. At that time there were many places where water was penetrating into the building, with consequent warping of flooring, collapsing of some ceilings, fungal attack, water staining and mould growth.

It would be the norm that hotels would be completely refurbished at intervals, and this trend has been particularly prevalent since the advent of package holidays in the 1960s since which time hotels have had to work hard at attracting business. In the case of the Baily Court the large-scale refurbishment appears to have begun in the 1940s and had a particularly active phase until the mid-1950s. It seems likely that many of the original internal features disappeared at that time. There appears to have been a very comprehensive remodelling of the interior in the later years of the twentieth century, when even those fittings and features that may have been installed in the mid-twentieth century were removed.

Externally the render to the front of the hotel appears to be of sand and cement and to be a later modification. The original facade appears to have been rendered, ruled and lined, and this survives on the gable ends of the main building. The front elevation, however, lacks the ruling and lining. The pattern of cracks running from the window opes suggests that the render is not flexible, and these may have resulted from the settling that occurred when the ground floor window opes were enlarged. The render has left a very small amount of the window sills projecting, indicating that the render is thicker than it was originally.

The building is generally in poor condition, with water penetrating down through the building to ground floor level, causing severe buckling in the floor coverings and extensive water staining in places on the walls and ceilings, much of it accompanied by brown staining that suggests that fungal attack is concealed behind the surface. The substantial level of water penetration has severely damaged the building and there has been further damage through vandalism.

The general lack of surviving earlier elements within the building and the very poor condition of the building would have been contributory factors in the decision by Fingal County Council to decide to grant permission for the demolition of the former hotel in 2013 and the decision of an Bord Pleanála to grant permission in the following year. The condition of the building has become considerably worse since that time. Even in 2012 the building was of such poor quality that planning permission was granted for its demolition (planning reference F13A/0110, An Bord Pleanála reference PL06F.242595). It is now in considerably worse condition, and in its current state detracts from the architectural conservation area. Accordingly, its removal would represent a benefit to the architectural conservation area.

Howth Martello Tower



Plate 8: Approach to Howth Martello tower

The Martello tower at Howth is approached via a steep pathway that leads from Abbey Street. To the right of the pathway, on the slope up to the tower, there is dense planting that screens the view towards the application site. At the top of the slope a pair of stone gate piers marks the entry to the relatively flat ground on which the tower stands, though the tower sits in a slight hollow. The ground is surfaced with grass, cut short, and is surrounded by a steel railing at the top of the cliffs and sloping ground that surround the grounds of the tower.

The trees within the application site to the right of the approach path are to be removed and replaced as part of the landscaping scheme. These are lower down the slope than the trees shown in the view above and while the proposed apartment building B would be visible from the path the ground on which it will sit

will be at a much lower level than the Martello tower and the presence of the apartments will not have an adverse effect on the character and setting of the Martello tower.



Plate 9: Howth Martello tower

The tower itself is a circular building with its main door at first floor, approached via a flight of steel stairs. There is one window, facing north away from the application site. The tower is rendered and has a machicolation over the door. The machicolation – seen projecting above the doorway, was an overhanging feature that provided the opportunity for those defending the tower to shoot pistols or muskets down at anyone who was attempting to force their way through the door. In this view of the tower there would be no impact on the character or setting of the tower, as the application site is off to the right in this view.



Plate 10 : Howth Martello tower seen from the east

The site on which the tower stands allows for movement around the perimeter of the tower to view it from all sides, though it is a small enough site that it is not possible to get distant views of the tower from within its grounds. In the above view, from the east, the proposed development would have no impact on the character or setting of the tower as it would be to the rear of the viewer.



Plate 11: View southwards past tower towards application site

From the northern perimeter of the Martello tower site the application site may be seen in the view past the tower. This is the only viewpoint within the grounds of the tower where any reasonable view of both the tower and the application site may be seen. As seen in the photograph the tower dominates this view, being much closer to the viewer than the site in the distance. The proposed development would be relatively low in this view and would read as part of the gathering of buildings that is already seen in this view on either side of the application site. It is not considered that the proposed development would have any significant impact on the character or setting of the Martello tower from within its grounds.



Plate 12 : View of Martello tower from landward end of East Pier

The significant height of the platform on which the Martello tower stands ensures that the tower is partially concealed from view when seen from relatively close by, as illustrated in the photograph above. In a view such as this the application site and its proposed development would not be seen.



Plate 13: View of Martello tower from the East Pier

At longer distances this effect still applies. The photograph above was taken from the East Pier, at a point approximately 300 metres from the tower. The viewer still looks upwards at the tower and the proposed development would not be visible in this view, though it would become more visible in views from a greater distance, as is discussed below. There would be no impact on the character or setting of the Martello tower in this view.



Plate 14: View of Martello tower from East Pier

The photograph above was taken from near the first turn in the East Pier, on its lower walkway, at a distance of approximately 450 metres from the tower, using a telephoto lens. From this viewpoint the tower is seen with the rising ground beyond as a backdrop and to a significant extent it blends into the background. The top of the tower of the Church of the Assumption in Main Street is seen to the right of the Martello tower. This church is located significantly higher up the street than the Baily Court Hotel and it gives an indication of the extent to which the high ground on which the Martello tower stands masks the land beyond. The proposed buildings would begin to be visible from this point, as seen in montage View 17 reproduced below, from the Verified Photomontages document produced by Digital Dimensions and submitted with this application. The proposed buildings would not stand out in this view due to the backdrop of the Hill of Howth behind it. As View 17 shows, there would be no appreciable impact.



Plate 15: Photomontage View 17, showing proposed development from the East Pier



Plate 16: View from Ireland's Eye

The photograph above was taken from the summit of Ireland's Eye. This view is not visible to the naked eye with this clarity, as it was taken with a long telephoto lens. The Martello tower is barely visible against the background, while the houses and other buildings around and beyond it provide a clutter of coloured buildings into which the proposed development would blend with no impact on this view.

Montage View 18 reproduced below, from the Verified Photomontages document produced by Digital Dimensions and submitted with this application, shows the view from the West Pier. The proposed buildings would be barely discernible in this view due to the backdrop of the Hill of Howth behind them. As View 18 shows, there would be no appreciable impact.



Plate 17: Photomontage View 18, showing proposed development from the West Pier



Plate 18: View of Martello tower across harbour from west

When viewed from further to the west the Martello tower stands in silhouette against the sky, though the lower part of the tower is still concealed. In this view the application site is off to the right and at a significant separation from the tower, with a belt of trees between the viewer and the site for the proposed development.



Plate 19: View of Martello tower from green alongside Harbour Road

The view from an alternative viewing point on the grass alongside Harbour Road is similar to that in the previous photograph, though closer. The application site is towards the right in this view, at a significant angular separation from the Martello tower and with numerous trees separating the application site from the viewer.



Plate 20: View from Kilrock

From some locations along Balscadden Road to the east of the application site there are views of the Martello tower on its high ground. The application site is located to the left of the Martello tower in this view. The proposed buildings that would be closest to the tower would be 3-4-storey in height above ground level at this point, with a basement car park below. The base of the tower would be close to the floor level of the top-floor apartments in the building closest to the tower, as seen in site sections submitted with the application. The closest distance between the nearest proposed building and the tower would be approximately 47 metres and at this distance the small height to which the building would rise above the base of the tower would ensure that the proposed building would have little or no impact on the setting of the tower as seen from this angle. The proposal is shown in View 16 reproduced below taken from the Verified Photomontages document produced by Digital Dimensions and submitted with this application.



Plate 21: Photomontage View 16, showing proposed development from Balscadden Road

Martello tower and St Mary's Abbey



Plate 22: View towards application site from grounds of abbey

From the greater part of the grounds of St Mary's Abbey the view of the application site would be obscured by the buildings along Abbey Street. This is illustrated in the photograph above. Parts of the proposed development would be seen from the grounds of the Abbey, but this would not result in any adverse impact as the new buildings would be masked to a large extent by the houses seen in this photograph. The proposed development as seen from this location is seen in View 11 reproduced below taken from the Verified Photomontages document produced by Digital Dimensions and submitted with this application. As can be seen, the development will be visible on the hillside behind Abbey Street, but the houses in the street will remain the dominant element.



Plate 23: Photomontage View 11, showing proposed development from Howth Abbey



Plate 24: View from high ground at entry to St Mary's Abbey

The Abbey grounds are entered from higher ground along Church Street. From this higher level a small part of the application site can be seen, and this lies to the right of the red-brick houses in the centre of the photograph. From this angle the Martello tower is largely concealed behind trees and there is no vista of the tower that would be affected by the proposed development. The proposed buildings would blend with the existing houses seen in the photograph and would have no adverse impact on the character or setting of St Mary's Abbey.

Architectural Conservation Area



Plate 25: View towards site from junction of Main Street and Church Street

The application site lies to the east of Main Street and in general would not be seen from Main Street due to the presence of buildings along the street frontage. Views towards the site from Church Street and from St Lawrence Road provide

scope to see the application site and the proposed buildings from a greater distance. The buildings along Main Street that back on to the site are generally more modest than many of the buildings in Howth village, being two-storey and with hipped roofs.

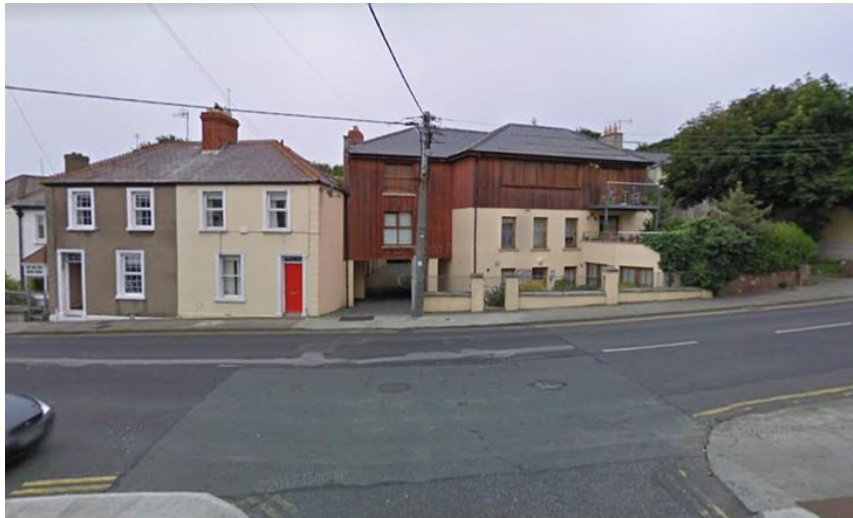


Plate 26: View towards site from junction of Main Street with St Lawrence Road

Opposite the end of St Lawrence Road there is larger building of more recent date, while further up the street, towards the Baily Court Hotel, there are trees and a small single-storey building of twentieth-century date.

Balscadden Road



Plate 27: View up Balscadden Road towards the application site

Balscadden Road has an industrial heritage significance, as the route of the railway that carried the stone from the quarries at Kilrock to the site for the construction of the harbour. The road is associated with the eminent engineer,

John Rennie, who designed the railway, including cutting the route of Balscadden Road out of the side of the cliffs. The straight section of Balscadden Road, from a point adjacent to the application site, was an inclined plane, down which wagons loaded with stone were lowered along the rails with a system of chains, which also returned the empty wagons to the top using a funicular system.

The proposed development would not have any adverse impact on the route of the former railway line or on its setting as there are no visible remnants of the former railway at this location other than the road itself, which has been altered significantly since the railway ceased to exist.

Proposed buildings

The proposal includes changes to the contours of the site followed by the erection of four buildings of differing sizes. Block A is to be close to Main Street, to the rear of the existing health centre and is to be a relatively small building. Block B is the largest of the proposed buildings, to be located in the northern part of the site and built around a central courtyard. Block C would lie to the south of Block B, set back from Main Street and it is proposed to provide a new street running between Blocks B and C and providing a pedestrian route to connect Main Street with Balscadden Road. Block D is to be erected on the site of the former Baily Court Hotel, fronting onto Main Street at the southern end of the site.

Block A

The proposed Block A is to be three storeys in height. Its plan form is to be based on a rectangle, but with the southern wall at an angle, parallel to the proposed street adjacent. The roof is to be pyramidal with a raised section at the apex, in recognition of the lantern on the pyramidal roof of the adjacent existing health centre and the elevations are to be rendered. This building will rise higher than the health centre, but, being set back from the street, and having a pitched roof, it will sit in well with the character of the architectural conservation area.

Block B

Block B will take up a substantial proportion of the site. It is to vary from two- to five-storey, over a basement car park, and will have a flat roof. The northern section will be closest to the Martello tower and will be three-storey over the basement. There is a steep bank at the northern end of the site and this slope is to be cut into and held back by a retaining wall. The difference in levels between Block B and the Martello tower will ensure that the building will be relatively low when seen from the tower, as seen in View 9 in the Verified Photomontages document prepared by Digital Dimensions and submitted with the application. The proposal to plant trees along the northern margin of the application site, alongside the proposed Block B will further reduce the visibility of the building as seen from the Martello tower and its surrounding lands. Views 10, 16, 18 and 20 of the

Verified Views submitted with the application show the proposed Block B in the context of the Martello tower and demonstrate that the building will not have an adverse effect on its character or setting in view of the low level of the proposed Block B in relation to the Martello tower, the distance separation between the tower and Block B and the cleans lines of the proposed building.

Block B will also be visible from Abbey Street, Main Street and Church Street, within the Howth Historic Core Architectural Conservation Area (ACA). Views 2, 3, 11 and 12 submitted with the application show the proposed Block B as seen from the ACA and from the grounds of Howth Abbey. These demonstrate that the apartment building will not be dominant in the street scene or from the abbey or the ACA in general and accordingly the proposed development will not have an adverse effect on the architectural heritage of the street, the abbey or the Howth Historic Core Architectural Conservation Area.

Block C

The proposed Block C will be part four-storey and part five-storey and will be located at a distance from the Martello tower and Howth Abbey, as a result of which it will have no impact on the character of either of these sites. The block will also be set back from Main Street, with the closest part of the proposed building being 4-storey. The building will be visible from the junction of Main Street with the proposed new street but will be set back at a sufficient distance to have little or no impact on the character of the ACA.

Block D

Block D is to be located on the site of the former Baily Court Hotel and its design draws its influence from that of the hotel building. It is to be set back from the street behind a pergola, reflecting the form of the Baily Court, which has a single-storey structure across the front elevation. The block is to be mainly three-storey, plus a top floor at dormer level, with a two-storey element at the southern end. The building is to be gable-ended with a double-A roof, the two sections separated by a valley. From the street Block D will have the appearance of a three-storey building. The design, location and massing of Block D will ensure that it will blend into the streetscape as a suitable replacement for the Baily Court in the ACA.

Assessment

It is proposed to provide 180 residential units, tenant facilities, two retail units and a retail/café on a site between Main Street and Balscadden Road, Howth. This will require the demolition of the former Baily Court Hotel, with its associated outbuildings and a disused sports hall. Ground levels will be reduced within the site. The main vehicular entrance is to be from Main Street, with a secondary access from Balscadden Road.

As the photographs above have shown, the views of the Martello tower from various points around Howth vary considerably. In some places the tower is barely visible because of the significant scarp at the edge of the grounds of the tower and from these locations the application site would not be visible. In the distant views, such as those from the further points along the piers and from the extreme distance of Ireland's Eye the tower becomes almost invisible as its muted colour blends into the background, while the houses in Howth and its suburbs are more visible. In these views the proposed development would be visible, though not noticeable, given the backdrop of other houses, while the Martello tower would not be particularly visible and hence the proposed development would have little or no impact on the setting of the tower. At intermediate distances the tower is visible against the skyline, while the application site is obscured either by the high ground on which the tower stands or by the buildings in Abbey Street and the trees behind.



Figure 9: Section through site from north to south

The image above shows a section through the application site, looking to the east, with the proposed development seen in the centre. The Martello tower is seen toward the left. It may be seen from this that the proposed buildings at the northern end of the site are lower than the tower and are separated by a significant distance. The view also illustrates how the high elevation of the ground on which the Martello tower sits ensures that any viewer from the harbour to the north is looking up at the tower, while the proposed development is concealed by the rising ground when looking from the north.

One of the viewpoints from which the Martello tower and the proposed development would both be most visible is the view from Kilrock, along

Balscadden Road. However, there is a significant angular distance between the proposed buildings and the tower when seen from this viewpoint and this is illustrated in View V16 submitted with the application. The tower stands high and proud in this view, while the proposed buildings would be significantly lower and would be set into the hollow ground, thereby being less visible than the tower and having little or no impact on its setting. It should be noted that there is no public access to the roof of the Martello tower, which is used for the location of antennae in connection with the Hurdy Gurdy Museum of Radio and hence the view from the roof, or gun emplacement, is not a significant factor in the impact on the Martello tower.

The photographs and text above have also shown that the proposed development would have no appreciable impact on the setting of St Mary's Abbey. The development and the abbey would not be readily visible together in any view that would detract from the setting of the abbey. It would be possible to view parts of the development from the grounds of the abbey, as discussed above in the section that addresses the abbey, but the proposed buildings as seen in those views are in the background behind existing buildings and would not form a prominent feature in the vista.

The boundary of the Howth Historic Core Architectural Conservation Area (ACA) runs along the western and northern boundaries of the application site. The impact on the northern side is equivalent to the impact on the Martello tower and has been discussed above. From the west the proposed development would have no significant impact on the ACA. The significant changes in levels within the ACA and the enclosure resulting from the buildings lined along either side of the streets ensure that the land to the rear is not generally visible from along Main Street within the ACA. As a result, the proposed development would not be a significant element within the ACA on Main Street and would not have any appreciable impact on its character.

When seen from the junctions with Church Street and St Lawrence Road the longer range of the view allows for the proposed development to be seen above the roofs of the buildings in Main Street. The present views from these junctions are shown in plates 25 and 26 above. The development will be visible from these angles, due to the rise in ground level and the height of the proposed buildings. However, this is an urban context and the choice of materials and finishes on the new buildings will ensure that the new development will blend in with the backdrop as seen from the street. The existing buildings will be in the foreground in views from those junctions and hence will remain the dominant element in the views, with the proposed buildings to the rear appearing as a backdrop.

The Baily Court Hotel has been discussed above. During discussions with the Conservation Officer, Fingal County Council, some years ago it was clear that the demolition of the former hotel to facilitate new development would be acceptable and planning permission has subsequently been granted for its demolition. The factors that led to the decision being made to grant permission for its demolition still pertain, though they are more extreme as the building is now in far worse condition than it was at that time. Furthermore, the hotel has been seen to have been altered from its original historic form. The design of the buildings to be erected on the site of the hotel and its outbuildings has been carefully considered

in order to blend the new buildings in with the character of the street and the character of the hotel that is to be removed.

Development plan policies

The Fingal County Development Plan 2017-2023 contains a number of policies in relation to architectural heritage. Some of these are specific to works being carried out on protected structures, which would not be of relevance in the present proposal, while others relate to specific sites or areas within the county that are not in the vicinity of the application site. The following are relative objectives of the development plan:

Objective CH20

Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, is compatible with the special character, and is appropriate in terms of the proposed scale, mass, height, density, layout, materials, impact on architectural or historic features, and junction with the existing protected structure.

Objective CH25

Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the architectural heritage and seek to avoid them. The extent, route, services and signage for such projects should be sited at a distance from Protected Structures, outside the boundaries of historic designed landscapes, and not interrupt specifically designed vistas. Where this is not possible the visual impact must be minimised through appropriate mitigation measures such as high-quality design and/or use of screen planting

Objective CH32

Avoid the removal of structures and distinctive elements (such as boundary treatments, street furniture, paving and landscaping) that positively contribute to the character of an architectural conservation area.

Each of these objectives has been taken into account and the proposed development has been designed in such a way as to fulfil the objectives. Objective CH20 relates in part to works to protected structures, which is not relevant in the present proposal, while the rest of the objective concerns the settings of protected structures. The potential impacts on protected structures in the vicinity of the site have been discussed in this report and it has been shown that there would not be any adverse impact.

Objective CH25 seeks to avoid the impact on protected structures, designed landscapes and designed vistas of facilities such as services and signage and no utilities or signage in the present proposal would have any adverse impact on the character or setting of any protected structure. Similarly, the proposal would not involve the removal of any structures or distinctive elements that would positively contribute to the character of an architectural conservation area (ACA), in accordance with the requirements of objective CH32. The only significant structures within an ACA that would be removed would be the former Baily Court Hotel and its outbuildings and the text above assesses the removal of those structures, which lie within an ACA.

Conclusions

The proposed development seeks to remove a derelict hotel building and to provide four new buildings on a site that lies adjacent to a prominent Martello tower and to an architectural conservation area (ACA), while the front part of the application site lies within the ACA. The text above shows how the development has been designed in order to ensure that there is minimal impact on the Martello tower, the ACA and other elements of architectural heritage in the vicinity, any such impact being within acceptable limits.

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Appendix – Conservation guidelines

The preparation of an architectural heritage impact assessment is carried out in the context of the *Architectural Heritage Protection Guidelines for Planning Authorities* published by the Department of the Environment, Heritage and Local Government in 2004 and reissued by the Department of Arts, Heritage and the Gaeltacht in 2011. The main thrust of the guidelines relates to works to protected structures, though they are also relevant to projects such as the present proposal, where there are no protected structures on the site but there is an architectural conservation area the vicinity as well as protected structures and the potential impact of the development on these may be properly assessed.

The section of the guidelines that addresses development control contains the following paragraph:

6.4.15 For more extensive or complex works with a potential to have a major impact on the architectural heritage, a planning authority may require an applicant to submit a more detailed impact statement. This may be necessary to allow the planning authority to assess the full implications of the proposals and allow an informed decision to be made on the appropriateness of the development. An outline of the type of information that could be included in such an architectural heritage impact assessment is found in Appendix B of these guidelines.

This paragraph relates mainly to more extensive or complex works to a protected structure but is taken in this report to be of relevance in view of the extent of the proposed development.

Architectural Heritage Impact Assessments

Appendix B of the guidelines sets out the criteria that would normally be expected to be included in an architectural heritage impact assessment. The full text of this appendix is set out below, with comments added in blue to indicate how the present architectural impact assessments has met the guidelines.

B1.0 Requirement for a Report

B1.1 The requirement for an architectural heritage impact assessment will generally come about for one of two reasons:

- a) as part of a development application in order to provide sufficient information for the planning authority to make an informed decision on the potential impact on the architectural heritage, or
- b) where permission has been granted for works to a protected structure or a proposed protected structure, to record the existing fixtures or features which contribute to its special interest and which would be lost or altered as a result of the works.

This report has been prepared in response to paragraph (a).

B2.0 Scope of the Assessment

B2.1 The detail and extent of the assessment should be appropriate to the nature and scale of the proposed works. The object of the assessment should be to describe how the proposals would affect the character of the protected structure or any part of it. This will normally require a description of the existing structure, a description of the works proposed and a description of how any potential adverse impact on the architectural heritage is to be mitigated.

B2.2 Where comprehensive or wide-ranging works are proposed, the entire protected structure and the land and features within its curtilage may require to be included in the assessment. However, where proposals are limited in scale or relate to a specific part or parts of the structure, it will generally be sufficient to include a brief description of the structure as a whole, to provide a context for the proposals, but to concentrate the detailed assessment on those parts of the structure which will be impacted upon. If the application relates to a new building within the curtilage of a protected structure or proposed protected structure, the assessment should concentrate on the relationship between the structure and its setting, and the merits of, and impacts on, existing structures and features in the curtilage.

B2.3 Ideally, there should be full access to the structure for the author of the assessment in order for him/her to have a full understanding of the potential for the works to impact on the building.

As there are no protected structures on the application site the assessment concentrates on the relationship of the proposed development to the settings of protected structures in the vicinity and the architectural conservation area in line with the final sentence of paragraph B2.2. The Baily Court Hotel was visited by the present writer in 2012 and again, insofar as safety permitted, in 2021.

B3.0 Recording a Structure to be Altered or Demolished

B3.1 Where an assessment is intended as a permanent record of a structure, or part of a structure that is being altered or demolished, it may have to substitute for the structure itself and so must be capable of bearing on-going and repeated analysis, re-examination and reinterpretation. Specialist expertise may be necessary for the compilation of such architectural heritage impact assessments that describe and assess structural or other engineering matters or those relating to historic landscapes.

This paragraph is not relevant in the present report, the purpose of which is not to make a record of a structure, but to assess potential impacts.

B4.0 Competency of Author(s)

B4.1 The author(s) of an architectural heritage impact assessment should be appropriately qualified or competent to undertake the assessment. Where the works to the protected structure are unlikely to have more than a minor impact on the character of the structure, it may be acceptable that the assessment be undertaken by a person, or persons, without specialised expertise. However, where the protected structure is of high quality or rarity, or where the impact on the architectural heritage may be substantial, the planning authority could

make it a requirement that the assessment be carried out by those with relevant competence or expertise.

The author of this report is fully qualified in conservation and has the relevant competence and expertise to prepare this architectural heritage impact assessment.

B5.0 Elements of the Assessment

B5.1 The content of the assessment will vary in individual cases depending on the relative significance of the structure for which the assessment is being prepared and the nature and extent of proposals under consideration. The information set out below can be used as a guide. Assessments should generally contain three distinct but interdependent elements:

- a) a written account;
- b) a set of well-presented drawings;
- c) suitable photographs and/or other illustrations.

This report includes a written account, maps and drawings, suitable photographs and copies of views of the proposed development. Further drawings and particulars are submitted with the application including the Verified Montages document produced by Digital Dimensions in which twenty-two views of the proposed development are included, four of which, views 11, 16, 17 and 18 have been discussed and reproduced in the present report.

Written Account

B5.2 The written account of the building will usually comprise three parts:

- a) core data;
- b) short description of the building;
- c) analysis.

This report includes core data, as set out below, a description of the vicinity of the application site, there being no protected structure on the site that needs to be described as set down in paragraph B5.2(b). The report also includes an analysis of the proposed development and its potential impacts on architectural heritage.

Core Data

B5.3 The following core data on the building should generally be included in every report:

- a) purpose of the assessment. For example, where the assessment forms part of a planning application, this should be stated. Where the assessment is part of a response to a further information request from the planning authority, the planning reference and a copy of the further information request from the planning authority should be included with the assessment. Where the assessment is to fulfil the requirements of a condition of permission, the planning reference number should be given and a copy of grant of permission and relevant condition(s);

- b) name and address of the structure, including any local reference by which the building is known, where this is necessary to identify it;
- c) brief description of the typological aspects of the structure;
- d) Ordnance Survey map reference for the structure;
- e) National Grid reference, where necessary;
- f) details of the form, or forms, of statutory protection which apply to the site, for example:
 - i. Record of Protected Structures, including reference number;
 - ii. Architectural Conservation Area designation;
 - iii. Recorded Monument, including RMP reference number;
 - iv. Zone of Archaeological Potential;
 - v. Registered Monument, including RMP reference number;
 - vi. Preservation Order or Temporary Preservation Order;
- g) name of the individual (and their agency, if appropriate) who prepared the assessment, and his/her relevant qualifications or competency;
- h) date of the assessment and of the inspection;
- i) name of relevant planning authority;
- j) details of any declaration issued regarding the structure;
- k) National Inventory of Architectural Heritage registration number of the structure, where available².

All of the above are included in this assessment report, where relevant.

Description of the Structure

B5.4 This should be a concise description of the structure as it exists, noting all its salient features, and describing its external and internal appearance and setting, form, present function, type or purpose, materials, architect and date (where ascertainable). For large sites, where there is more than one structure, separate descriptions of each should be made together with an account of their relationship to each other.

The report includes a description of the architectural conservation area and the adjacent Martello tower and also refers to other structures in the vicinity.

Analysis of the Existing Structure

B5.5 Following on from the basic data contained in the short description, the written assessment should contain all or part of the following information as relevant to the particular case.

² Available from published surveys or from the NIAH website

B5.6 Where the development consists solely of new work, such as extensions or new build in the curtilage of a protected structure, items a) to c) can be briefly summarised:

- a) a description of the structure, recording features of note or historical significance, architectural or engineering design, building materials, building techniques and craftsmanship. Where comprehensive works are proposed, it may be appropriate that this description be carried out on a floor-by-floor, room-by-room basis;
- b) a description of the structure's overall development, noting evidence of successive building phases and supporting this analysis with annotated reference to stylistic elements, documentary sources or scientific dating methods, where appropriate. Reference should be made to original and present uses of the structure, or its parts;
- c) a description of the current physical condition of both the fabric and the structure in order to establish the nature and extent of any apparent damage, including any indications of previous demolition or alteration to the structure;
- d) a description of the relationship of the structure to its setting, noting the evolution and condition of the site, its impact on the landscape, ancillary structures (either current or removed) and their relationship to the principal structure in question. Where the proposal relates to new works this section should be comprehensive. However, it will not be relevant where internal works alone are proposed;
- e) information on persons or organisations associated with the construction, development or use of the building, including architects, engineers or builders, proprietors or other occupants, where known. Historically significant events with which the building was associated should also be included.
- f) certain structures may merit further investigation of record sources, such as Valuation Office records, deeds relating to the building in the Registry of Deeds, architectural drawings or other information in, for example, the Irish Architectural Archive, National Library of Ireland or the Archaeological Survey of Ireland, and historic census records.

[This item relates to works to a protected structure.](#)

Drawings

B5.7 Drawings of the structure, including site-plans, plans, sections and elevations, are generally necessary in order to locate the proposed works, the location and direction of the photographs included and to help in the assessment of the impact of the proposed development. Rooms or other spaces should be numbered and these numbers matched to written descriptions and illustrations where necessary to identify locations.

B5.8 Where alterations are proposed to only a small portion of the structure, it should not generally be necessary to include an exhaustive set of measured drawings for the entire protected structure. Indicative floor plans combined

with photographs should be sufficient to support the assessment in such cases.

The architect's drawings are submitted with the application.

Maps

B5.9 Where the building or structure appears on early Ordnance Survey or other historic maps and its development, or earlier form, is relevant to the development proposals, it would be useful to include copies of the pertinent sections of the maps within the assessment and cross-referenced to other parts of the assessment as necessary.

Historic maps are included.

Photographs

B5.10 A photographic survey of the relevant parts of the structure should be an integral part of the assessment. Where comprehensive works are proposed, the photographic coverage required for assessments could include floor-by-floor, room-by-room coverage of the internal appearance, and building elements, decorative features, details, fixtures or fittings, whether internal or external, noted as contributing to its character in the detailed written analysis.

B5.11 Where minor or small-scale works are proposed, photographs can be limited to those parts of the structure which will be impacted upon by the development. In such cases, it will nonetheless be useful to include enough general photographs of the structure to allow the context of the development to be appreciated by anyone reading the assessment.

B5.12 Colour-print film and digital images can be used for assessments to be submitted prior to a decision being made on the planning application. Scanned or digitally produced photographs should be printed legibly in the assessment to allow detailed examination. All copies submitted to the planning authority should be to the same standard, and not black-and-white photocopies. Captions should identify the purpose of the image and the location of the feature or space.

B5.13 Copies of relevant historic photographs, where available, could usefully be included with the assessment. All photographs should be clearly marked, identifying the location and the subject of the image, and when the photograph was taken and by whom (if known).

Photographs are included in this report and all colour photographs were taken by the author of the report on the dates given for the site surveys.

Anticipating Concealed Features

B5.14 Where the proposed works consist of alterations to an existing structure, concealed architectural features, such as chimneypieces, fireplaces, earlier openings, panelling, or decorative finishes, may come to light during the course of the works. Where there is any likelihood of this, the assessment should contain a schedule of reversible exploratory and enabling works and

note whether or not it is anticipated that further future approvals will be necessary as a result.

- B5.15 Where feasible, the assessment should indicate alternative design details or methods of work which would allow such features to remain in situ. Alternatively, the planning authority could attach an appropriate condition to the planning permission to ensure that these features will be retained or properly recorded as appropriate to their importance. Where removal is unavoidable, the assessment should suggest alternative locations within the structure for found features.

This item relates to works to a protected structure.

Impact Assessment

- B5.16 The author(s) of assessments compiled to accompany a planning application should be fully appraised of the development proposal. The assessment should contain an evaluation of the quality and importance of the structure. In addition, it should contain a comprehensive assessment of the implications of the development for the character of the structure and the area in which it is located. This should highlight how the elements of this character (those which contribute to its special architectural, historical, archaeological, artistic, cultural, scientific, social and/or technical interest) would be materially altered by the development.

This item relates to works to a protected structure, though the report includes full appraisal of the proposal, an evaluation of the importance of the historic structures in the vicinity and a comprehensive assessment of the implications of the development for the character of the conservation area and structures in the vicinity. The author was fully appraised of the development proposal and was part of the team throughout the design period.

Recommendations and Conclusions

- B5.17 Any recommendations and mitigation measures should be set out in accordance with the conclusions of the impact assessment, including an outline of proposed conservation works for agreement with the planning authority. Any scope of works statement or methodology included should be specifically written for the structure that is the subject of the assessment.
- B5.18 It may not always be necessary or desirable to include conclusions or recommendations in the assessment. In some cases it will be sufficient for the assessment to describe and assess the structure, with clear and relevant illustrations cross-referenced to the text. Such assessments should describe in detail the existing architectural heritage, the impacts of the proposals, and the potential to mitigate any negative impacts in order to allow the planning authority to arrive at its own conclusions regarding the appropriateness of the proposed development.

The report includes conclusions, though this section of the guidelines relates mainly to works to a protected structure.