

AN BORD PLEANÁLA

LDG- 022 171-19

ABP- _____

05 DEC 2019 *dot*

Fee: € 220 Type: C12

Time: 13:20 By: hand

Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

5th December 2019

Our ref: 18/4418

Ref: Appeal to Refusal of Dublin City Council for Section V Declaration – Reinsertion of Roof Light in Front Slope of 68 Brighton Road, Rathgar, Dublin 6.

Dear Sirs,

We act as Project Managers to Mrs. Mary Carty in respect of the above.

*RESIDENT.
68 BRIGHTON ROAD
RATHGAR DUBLIN 6.*

On her behalf, we wish to appeal against the declaration of Dublin City Council in regard to the retention of the above works.

We enclose herewith a report from our Conservation Planning Consultant Mr. Michael Reynolds, which deals with the circumstances of the development in detail.

We also attach the statutory fee.

If you require any further information or explanation of the facts submitted, please contact the undersigned.

Yours faithfully

John Doyle
Senior Partner/ Director



4 Claremont Court, Glasnevin Dublin 11

Michael J. Reynolds

Planning and Planning -Conservation Consultant

**Declaration in Respect
of**

No, 68 Brighton Road Rathgar Dublin 6

Submission to An Bord Pleanála for a Review of the Section 5 Declaration.

**of
Dublin City Council**

Ref. No 0488/19

Applicant. Mary Carty

Date of Decision 8th November 2019

Report for

Fitzsimmons Doyle & Associates 250 Harolds Cross Road

Report Prepared

By

**Michael J Reynolds, Planning-Conservation Consultant
(Address . As per headed note paper)**

Drawings and photographs by Fitzsimmons, Doyle and Associates.

Date report 3rd December 2019

AN BORD PLEANÁLA	
LDG- _____	
ABP- _____	
05 DEC 2019	
Fee: € _____	Type: _____
Time: _____	By: _____

Michael J. Reynolds, B.A. D.T.P., D.T.P.(R.T.P.I. London)

Section 5 Declaration Review . Submission to An Bórd Pleanála.

Address of Property . 68 Brighton Road Rathgar Dublin 6.

Date of making the Decision on the Declaration. 8th November 2019

Planning Authority : Dublin City Council. Ref No. 0488/19

Applicants Name . Mary Carty

Agents Name . Fitzsimmons Doyle and Associates.

Planning-Conservation Consultant. Michael J. Reynolds

Introduction.

This is a submission to An Bord Pleanála in relation to the Declaration made under Section 5 (3)(a) of the Planning Acts 2000-15 by Dublin City Council in respect of the following works at 68 Brighton Road:

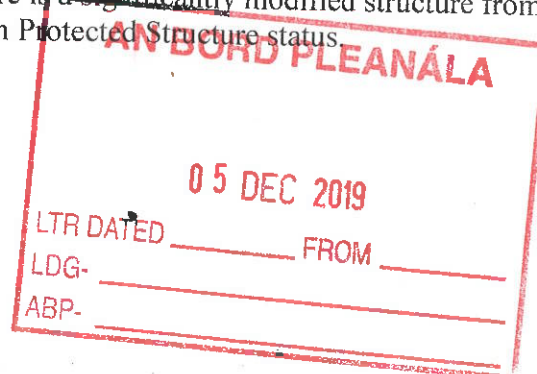
Whether the re-insertion of a small Roof-light in the front roof-slope of 68 Brighton Road is or is not development and if so is it Exempted Development.

A copy of the Declaration issued by the Dublin City Council is enclosed in Appendix 1 of this submission. Please note that reference to the proposed development in the Declaration and in the Planning Report on the Section 5 as consisting of 'roof-lights' is an error by the planning authority.

Background Information on No. 68 Brighton Road.

No. 68 is a two storey Victorian House, one of a pair, which dates from circa 1890. The building which is in residential use has a brick-fronted elevation with one pane over one sliding sash windows and an arched entrance door with head-light and a side lights. The roof consists of a single A roof with gable chimneys at its southern gable The roof profile is a simple un-ornate slated roof and a similar roof profile is continued into the adjoining house. The entire roof composition presents a large expanse of slated roof . See photograph No. 1 in Appendix 2 of this submission.

The existing structure has had the benefit of Planning Permission which was granted on appeal following a third party appeal. This planning permission Ref 3033/14 was in respect of a large extension to the rear as well as converting the roof-space and other alterations. Accordingly the existing structure is a significantly modified structure from that constructed in 1890 or when it was given Protected Structure status.



When the permission was being implemented it was discovered that there had been a roof-light in the roof of No 68 and that it had been slated over at some point but that the original frame had been partially retained within the roof structure but would not be evident from the outside. The original roof light which was located where the new roof-light has been inserted to provide roof ventilation according to information made available to the undersigned. Its removal may have been due to it not being weather proof. In any event the frame of the removed roof-light was carefully removed and is available for inspection on site.

The applicant considered that the replacing of a former roof-light by a similar sized one would not materially affect the character of the structure either externally or internally. The applicant considered that she was not obliged to seek a declaration under Section 5 or Section 57 prior to the insertion of a similar sized roof-light.. Internally the roof-light to which this report relates to and lights part of the interior converted roof-space which obtained planning permission and which is an extension to the original protected structure. This roof space extension should not, in my opinion have the same ranking as the original floor- space within the structure as it is a very recent intervention and received planning permission..

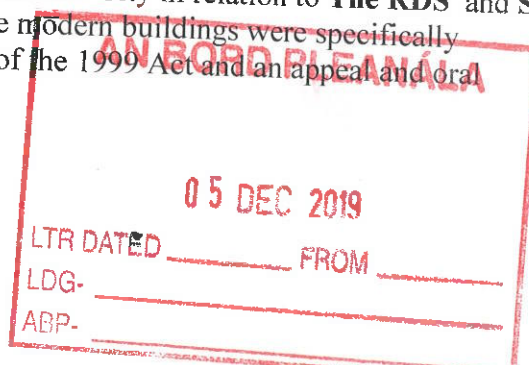
Relative Importance of 68 Brighton Road in the Dublin City Context.

In terms of Victorian Architecture the building involved is a modest two storey building which dates from c. 1890.. It is difficult to understand what the policy of the planning authority is in relation to such structures as a large number of houses of this period have had their interiors specifically excluded in the Record of Protected Structures arising from amendments to that Record which were included in the Draft Development Plan 2005-2011 and subsequently added to the RPS.

For example, 36 Victorian Houses, c.1890 at Killeen Road Dublin 6, have had only their exteriors protected as the interiors were specifically excluded. For the complete list of houses whose interiors are excluded in the 2005-11 Draft Plan. Appendix 5 of this report contains an extract from the Draft Plan 2005-2011 which was adopted by the City Council. The adopted changes were then included in the RPS and that is the position at present. In total 273 buildings were proposed to have their interiors specifically excluded in the 2005-2011 Draft Development Plan.

A Planning authority is of course legally entitled to only include part of a structure in the RPS. However the large scale exclusion of interiors does raise many questions as to whether the planning authority has been applying a consistent policy with regard to the structures being added to and also to those of the same period which still remain in the RPS.

The planning authority for the city has had to deal with extended building complexes and extended buildings. See Record of RPS for Dublin City in relation to **The RDS** and **St Mary's Hospital** in the Phoenix park where modern buildings were specifically excluded. Following the coming into force of the 1999 Act and an appeal and oral



hearing at planning authority level, parts of the Shieling Hotel Howth Road were specifically excluded from the RPS.

This information relating to the cases cited above is readily available to any member of the public.

Accordingly there is plenty of evidence and precedent for stating that modern extensions to a protected structure should be excluded from the RPS. It is reasonable to put forward the case for the extensions to No 68, including the roof-space extension, being excluded from the RPS. That is a matter for the owner to consider making such request to the planning authority at some future date

Under the classification of Buildings used by the National Inventory No. 68 Brighton Road would be classed as being of local interest only in my opinion.

Re-instatement of missing components in Protected Buildings.

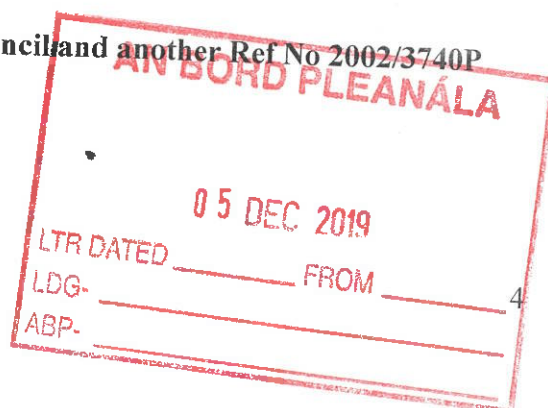
In the Conservation Guidelines issued by the DOE on conservation there is a section dealing with what are referred to as 'Dummy Windows'. This type included windows which were blocked up, usually, in masonry. The guidelines promote the re-opening of such windows and the re-insertion of an appropriate window to match original. In dealing with Section 57 declarations for a building it is my experience that any planning authority usually would allow for the re-insertion of the missing window without the need to apply for planning permission subject to normal safeguards..

In the case of No. 68 Brighton Road there is evidence of the existence of a former roof-light in the front roof-slope. The insertion of the present rooflight, which is generally no larger than the original which existed should be treated generally in the same way as Dummy Windows were intended to be dealt with using sound judgement and common sense within the parameters laid down in the Planning Acts and the Conservation Guidelines.

Critique of the Planning authority's report on the Section 5

In Appendix 3 of this report I include a copy of the planning authority's report. The main report was written by a Conservation Official and not by a planning official. A similar issue arose in the case of a house in the Merrion Square Area of the City where a judicial review of the handling of a planning application relating to a Protected Structure resulted in the decision of the planning authority being quashed. I have read the entire judgement of the High Court. The name of the case was,

Illium Properties Limited v. Dublin City Council and another Ref No 2002/3740P



It is stated on the High Court Web. Site that the Conservation Officer was also cited by name as a defendant and is referred to as **Another** in the case summary. It is not my practice to name officials in a planning submission.

In the judgement the Judge after hearing all the evidence including evidence from the then Conservation Officer of Dublin City Council quashed the decision having examined the decision making process of Dublin City Council. One of the reasons for the High Court Decision was that the Conservation officer (a non planner) was considered not to have a planning function or expertise in planning matters. In the words of the Learned Judge " the conservation officer was not a planner".

Given the above decision by the High Court I am surprised that the Council should be following the practice of apparently letting a conservation person decide a planning control issues. Planning Control Issues, which a Section 5 reference is, should be written in full, in my opinion, by an experienced planner who is free to take advice from any other relevant official but must then formulate his or her judgement after taking all relevant matters into account. What has been done in this case by the planning authority in processing this Section 5 would appear to be similar to the practice which was found to be at fault by the High Court in the case referred to above.

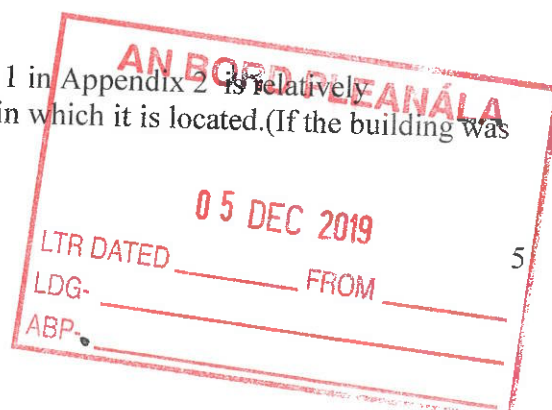
The decision of the planning authority on the subject case, appears to me, to be based on an acceptance without question of the Conservation Guidelines issued by the DOE, without any discussion on the various provisions of the Planning Acts which were referred to in the submission made to the planning authority. In the Bentham Case (that is Dublin Corporation v Bentham July 1992) the High Court held that a listed building was entitled to avail of similar existing features which existed in buildings in the vicinity under Section 4.1 (g) of the 1963 Act . Photograph No 2 in Appendix 2 show that other buildings on Brighton Road which are protected structures have roof-lights in the front slopes of the roof.

It should be noted that the 1999 Planning Act classed all listed buildings as equivalent to Protected structures and provided for their direct transfer to the Record of Protected Structures without any further assessment as regards their merit under the headings contained in the 1999 and later Planning Act 2000.

The former roof-light which I am informed existed in the front of the building was not there when the current owner purchased the premises. While a photograph does not appear to exist of the previous roof-light the planning authority was informed that the remains of it could be inspected on site. It is most unfair, at least, and in my opinion incorrect planning practice for the planning authority to dismiss this available evidence just because there is no photographic evidence. The scale of the existing roof-light is similar to the previous one.

Concluding Statement

The existing roof-light as shown in Photograph 1 in Appendix 2 is relatively insignificant given the expanse of the roof within which it is located.(If the building was



not a protected structure I am satisfied ,from what I have observed throughout Ireland, that the subject roof-light would be deemed to be exempted development.) The height and slope of the roof and the dominance of the chimneys, ridge-line and the roof profile are not in my opinion materially affected by the roof-light involved than they were when the previous roof-light existed. It is noted that some state owned buildings e.g. The Garda Headquarters Buildings in the Phoenix Park has what appears as Velux roof -lights in their front slope in parts of the complex.. Such State owned buildings are of course protected structures.

As the proposed roof-light would replace a former roof-light which had been covered over at one time and is much smaller than roof-lights in the front slope of other Protected Structures on Brighton Road including buildings directly opposite No. 68 (See photograph No.2 in Appendix 2)

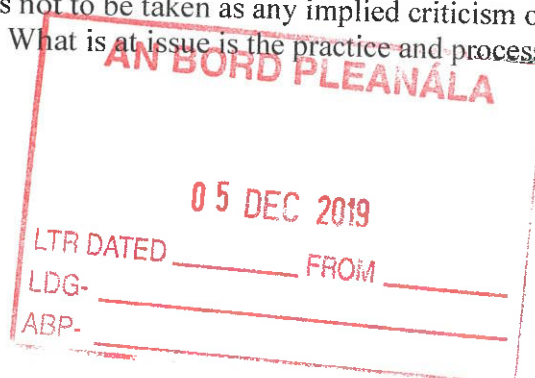
Where in this report reference is made to legal cases I am drawing attention to the particular practice which appears to me to have been a central issue in the judgement of the High Court. All persons are obliged to have due regard for the interpretation of the law and administrative law practice as have been adjudicated on by the Higher Courts. Certainly the Planning authority ie **Dublin City Council** who were party to such proceedings should be fully aware of the implications of these judgements and to take account of the Court's judgement in their subsequent planning practice.

It is my experience that many planning authorities have pre-conceived ideas as to what or what is not exempted development. **The Conservation Guidelines are not a legal interpretation of the Planning Acts.** Planning authorities have to have due regard to them but that does not mean that the full analysis of any Section 5 matter can or ought to be side-lined because of some comments contained in the Guidelines. If all developments in the case of Protected Structures were to be excluded by Section 57 then Section 4.1.(h) would not be permitted to apply at all to Protected Structures. **That is not what has been provided for in the planning Acts.**

In the event that the Board accepts, due to the previous existence of a similar roof-light in the front roof of No. 68 based on the evidence available on site it is reasonable, in my opinion, for the appellate authority to find:-

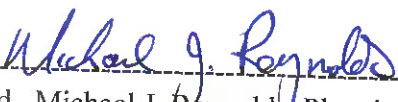
A) That the small roof light the subject of this Section 5 would not conflict with the character of the protected structure then the Board would appear to have to consider the roof-light under 4.1 (h) of the 2000 Act (Amended) In those circumstances the existence of roof-lights in the front slope of neighbouring buildings would appear to me to be particularly relevant having regard to the wording of the section and the Judgement in the Bentham Case.

In this report the particular practice pursued by the planning authority in processing this Section 5 has been criticised. This is not to be taken as any implied criticism of the individuals involved in the process. What is at issue is the practice and processes which



be in conflict with the Illium Properties case already referred above. The appellants case does not solely rest on the principle contained in that judgement but on the facts and opinions as set out not only in this report but also in the submission to the planning authority which accompanied the Section 5 application.

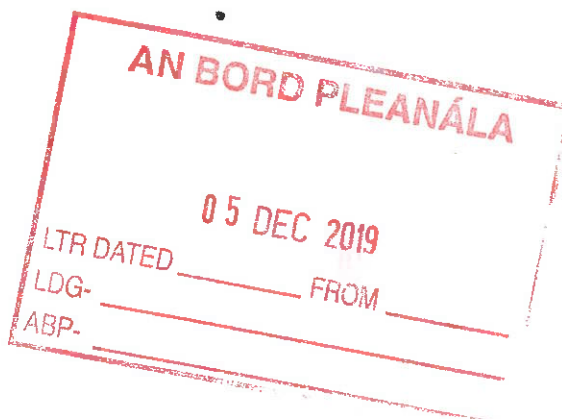
The matter now rests with An Bord Pleanála.


----- Date-3rdDecember2019
Signed . Michael J. Reynolds, Planning- Conservation Consultant.

Note. The author of this report was appointed head of the PLanning Conservation of Dublin City Council subsequent to the 1999 Planning Act coming into force. As such I had responsibility for dealing with all Declarations under Section 57as well as other matters. As part of my work I dealt with some of the most important buildings in Dublin including Trinity College, Bank of Ireland , College Green and the Custom House to mention but a few.

Having regard to the difficulties posed by the definition of a Protected Structure I developed the principle of excluding modern buildings from the RPS as well as excluding parts of Protected Structures which were of no conservation importance. One of the reasons for this approach was to facilitate the sale and alterations of modern building when required and also to facilitate normal Exempted Development to such buildings. The author also gave occasional lectures to the Planning Students in UCD on Declarations and also to the Dublin Civic Trust. The author resigned from the City Council in 2004.

MJR.



Appendix 1

**Copy of Declaration Issued
Planning Authority.**

AN BORD PLEANÁLA

05 DEC 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____



An Roinn Pleanála & Forbairt Maoin, Bloc 4, Urlár 3, Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8.

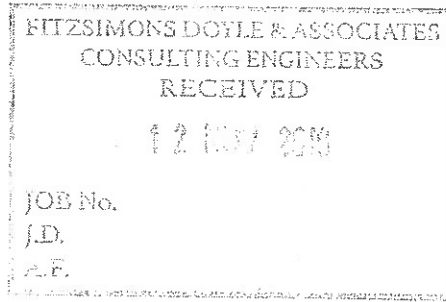
Planning & Property Development Department, Block 4, Floor 3, Dublin City Council, Civic Offices, Wood Quay, Dublin 8.

T: (01) 222 2288

E. planning@dublincity.ie

11-Nov-2019

John Doyle,
Fitzsimons Doyle & Associates
250, Harolds Cross Road, Dublin 6w



Application Number	0488/19
Application Type	Section 5
Registration Date	14-Oct-2019
Decision Date	08-Nov-2019
Decision Order Number	P5596
Location	68, Brighton Road, Rathgar, Dublin 6
Proposal	EXPP: PROTECTED STRUCTURE: Whether the replacement of rooflights is considered to be development or exempted development?
Applicant Details	Mary Carty

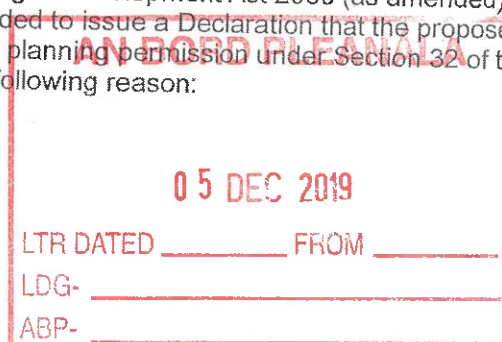
- If you have any queries regarding this Decision, please contact the number shown above

Note:

Any person issued with a declaration on development and exempted development, may, on payment of the prescribed fee, refer a declaration for review by A Bord Pleanála within four weeks of the date of the issuing of the declaration.

NOTIFICATION OF DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

In pursuance of its functions under the Planning & Development Act 2000 (as amended), Dublin City Council has by order dated 08-Nov-2019 decided to issue a Declaration that the proposed development is NOT EXEMPT from the requirement to obtain planning permission under Section 32 of the Planning & Development Act 2000 (as amended) for the following reason:



Cearnaíocht, Oifigí na Cathrach, An Ché Adhmaid, Bhaile Átha Cliath 8, Éire.
Head Office, Civic Offices, Wood Quay, Dublin 8, Ireland



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

An Roinn Pleanála & Forbairt Maoine, Bloc 4, Urlár 3, Oifigi na
Cathrach, An Ché Adhmaid, Baile Átha Cliath 8.

Planning & Property Development Department, Block 4, Floor 3,
Dublin City Council, Civic Offices, Wood Quay, Dublin 8.

T: (01) 222 2288

E. planning@dublincity.ie

11-Nov-2019

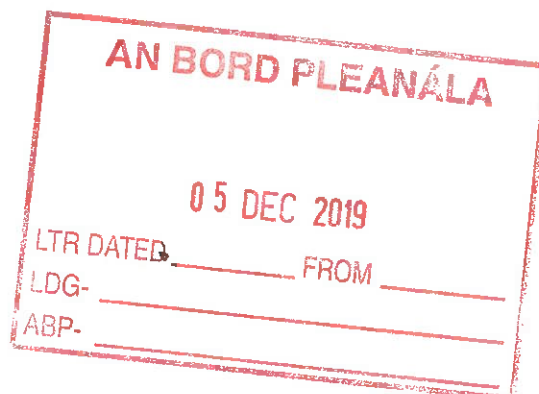
1. It is considered that the proposed works as summarised below comprise development which would not come within the meaning of Section 4(1)(h) and Section 57 of the Planning and Development Act 2000 (as amended) as the proposed development would materially affect the character of the Protected Structure and therefore would require planning permission:

The insertion of a small conservation-type rooflight into the front roof-slope of a Protected Structure.

Signed on behalf of Dublin City Council


For Assistant Chief Executive

Note: Any person issued with a declaration on development and exempted development, may on payment of the prescribed fee, refer a declaration for review by An Bord Pleanála within four weeks of the date of the issuing of the declaration.



Ceannofíóg, Oifigi na Cathrach, An Ché Adhmaid, Bhaile Átha Cliath 8, Éire
Head Office, Civic Offices, Wood Quay, Dublin 8, Ireland

NOT1section5(Refuse Exemption)

T. 01 222 2222 W. www.dublincity.ie

Appendix 2

Photographs

AN BORD PLEANÁLA

05 DEC 2019

LTR DATED _____ FROM _____

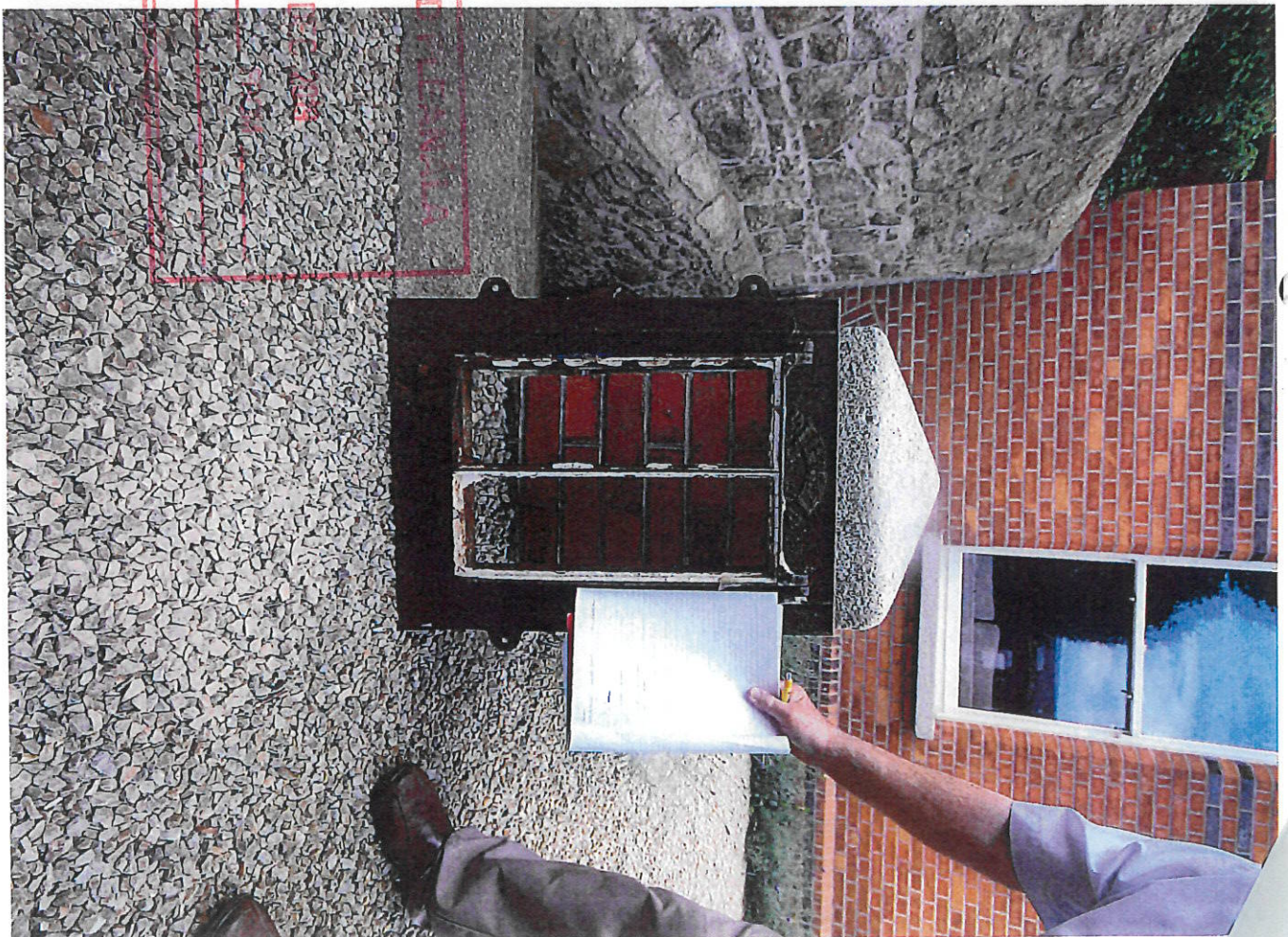
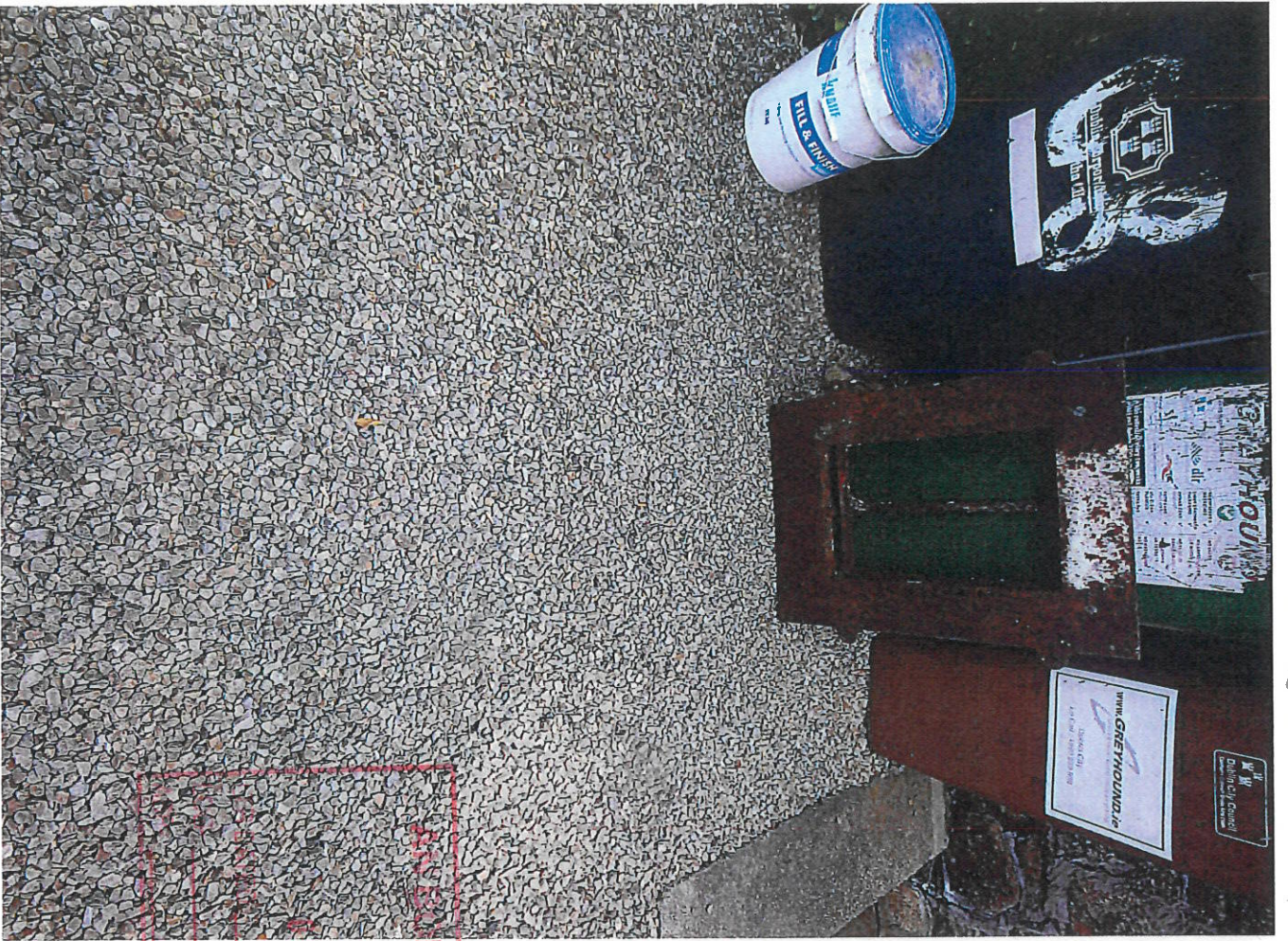
LDG- _____

ABP- _____

PHOTO No 2



PHOTO No 1



AN BORD PLEANÁLA

05 DEC 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

Appendix 3
Copy of Planning Report

DUBLIN CITY COUNCIL

Planning Department, Conservation Section

Tel. 01 2223926. Fax. 01 2222830

EXPP: 0488/19

APPLICANT: Mary Carty, 68 Brighton Road, Rathgar, Dublin 6.

AGENT: Fitzsimons Doyle & Associates, 250 Harold's Cross Road, Dublin 6W.

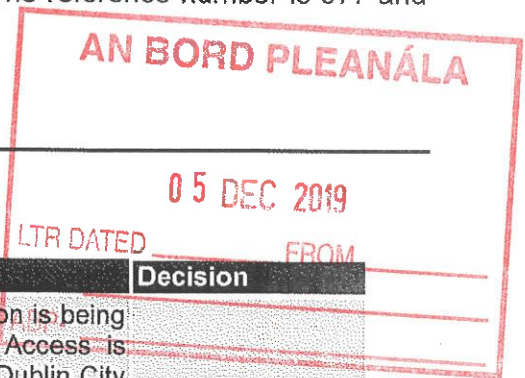
ADDRESS: 68 Brighton Road, Rathgar, Dublin 6.

PROPOSED DEVELOPMENT: Replacement of rooflights.

STATUTORY PROTECTION:

The house at 68 Brighton Road, Rathgar, Dublin 6, is on the current Record of Protected Structures (Dublin City Development Plan 2016-2022). The reference number is 977 and the description reads 'House'.

DATE OF REPORT: 06/11/2019



PLANNING HISTORY

Ref No.	Description	Decision
2428/17	PROTECTED STRUCTURE - Planning permission is being sought for pedestrian access to rear garden. Access is requested from lane owned by and in charge to Dublin City Council, to the rear of 65, 66 and 67 Brighton Road and adjacent to 25, St. Enda's Road, Terenure, Dublin 6. Permission is also sought to raise wall at end of lane by 1m to match height of adjacent properties on lane.	GRANT PERMISSION
3033/14	PROTECTED STRUCTURE: The development will consist of: Repair and repointing of brick wall to front, repointing of brickwork to front elevation, refurbishment of original sash windows to front and replacement of non-original windows to rear, removal cill and wall below cill to rear reception room to provide doorway, removal of non-original partitions, suspended ceilings, fittings and fixtures, replacement of modern fireplaces surrounds with historically appropriate surrounds, demolition of lean to single storey extension and bay window to rear total area 13.2sq.m, construction of new single storey extension to rear total area 51.8sq.m, repair of natural slate roof, replacement of rain water gutters and downpipes, localized repair to chimneys, provision of dry lining to return, provision of new internal stairs to attic floor and construction of dormer window to rear of same, installation of new bathrooms, partitions and associated ancillary works, removal of mechanical and electrical services, decoration throughout and construction of garden shed to rear garden.	GRANT PERMISSION

PLANNING ENFORCEMENT HISTORY

Ref. No.	Opened	Reason	Closed	Reason
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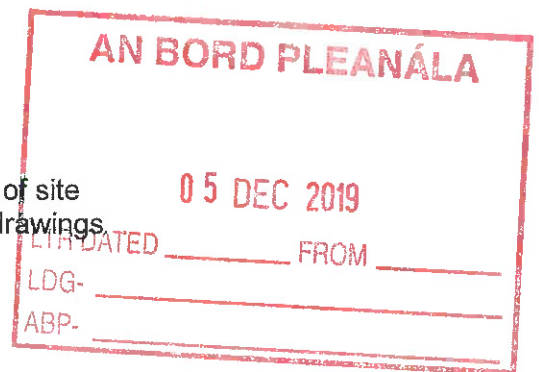
E0552/19	25-Jun-2019	Front wall demolished & skylight inserted	-	-
E1400/17	19-Dec-2017	Demolition of boundary wall	09-Jul-2018	Resolved
E0306/15	28-Apr-2015	Demolition of boundary wall	31-Jul-2017	Complies with permission

SECTION 57 DECLARATION

No Declaration under Section 57 of the Act has been requested or issued for the Protected Structure by the Planning Authority.

INFORMATION SUBMITTED WITH THE APPLICATION

1. Application form
1. Site location maps
2. Aerial photographs of site
3. Plans and section drawings
4. Report



REPORT/ASSESSMENT

The application for a determination under Section 5 of the Planning and Development Act 2000 (as amended) relates to the insertion of a small conservation-type rooflight into the front roof slope of a Protected Structure.

The building is subject to an open enforcement (E0552/19) relating to the demolition of the front wall and the insertion of a skylight.

The building is a late nineteenth century house. It has a two-storey extension to the rear and the attic space has been converted for habitable accommodation under planning application ref. 3033/14. Subsequent to the completion of the works permitted under this grant of planning a rooflight was inserted into the front roof slope of the building.

While the applicant submits that the inserted rooflight is in fact a re-insertion of a feature which previously existed in the front slope and has in his possession the cast-iron framework of the rooflight which existed at one time, the applicant has not provided any historical or photographic evidence on where the rooflight was originally located and when it was covered over.

A letter from Fitzsimmons Doyle & Associates, Consulting Engineers (dated 18th July 2019), a response to the enforcement proceeding (E0552/19), indicates that the rooflight 'provides daylight to the bathroom in the converted attic space'. The plan and section drawings accompany planning application ref. 3033/14 indicate this space as part of the attic study room rather than a separate bathroom.

While the insertion of 'new rooflights and dormers on minor or concealed slopes may be considered acceptable in some cases' (Department of Culture, Heritage and the Gaeltacht's Architectural Heritage Protection Guidelines for Planning Authorities, p.150) the insertion of the new rooflight into the principal, front slope of the roof would constitute a material alteration of the character of the protected structure and therefore would not be considered exempted development.

RECOMMENDATION

It is considered that the proposed works as summarised below comprise development which

would not come within the meaning of Section 4(1)(h) and Section 57 of the Planning and Development Act 2000 (as amended) as the proposed development would materially affect the character of the Protected Structure and therefore **would require planning permission:**

The insertion of a small conservation-type rooflight into the front roof-slope of a Protected Structure.

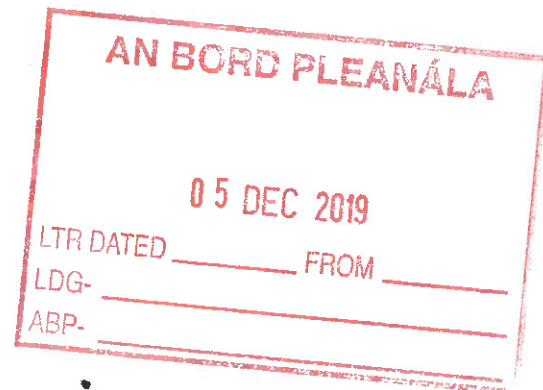
Aislinn Collins
Assistant Architectural Conservation Officer

Date

I have read the Declaration on the above property, which is included in Dublin City Council's Record of Protected Structures. I recommend that the Declaration under Section 5 of the Planning and Development Act, 2000 be issued to the owner/occupier in terms set out attached.

Paraic Fallon
Senior Planner

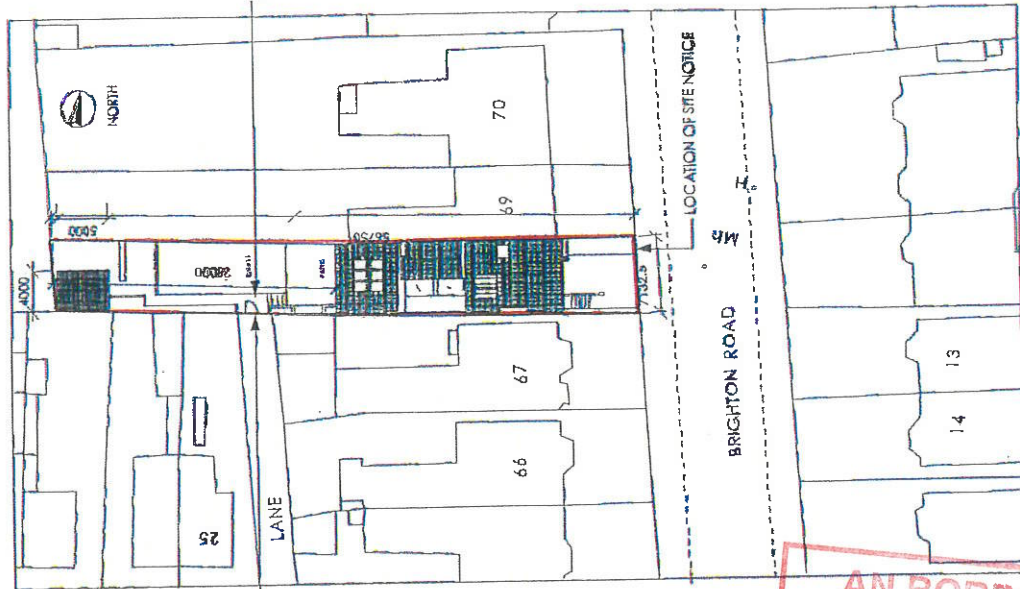
Date



AN BORD PLEANÁLA
05 DEC 2019
LTR DATED _____ FROM _____
LDG- _____
ABP- _____

Appendix 4

Drawings.



SITE LAYOUT PLAN 1:500

DEC PLAN NO: 2428/17
RECEIVED 08 MAR 17

AN BORD PLEANÁLA

 05 DEC 2019
 LTR DATED _____ FROM _____
 LDG- _____
 ABP- _____



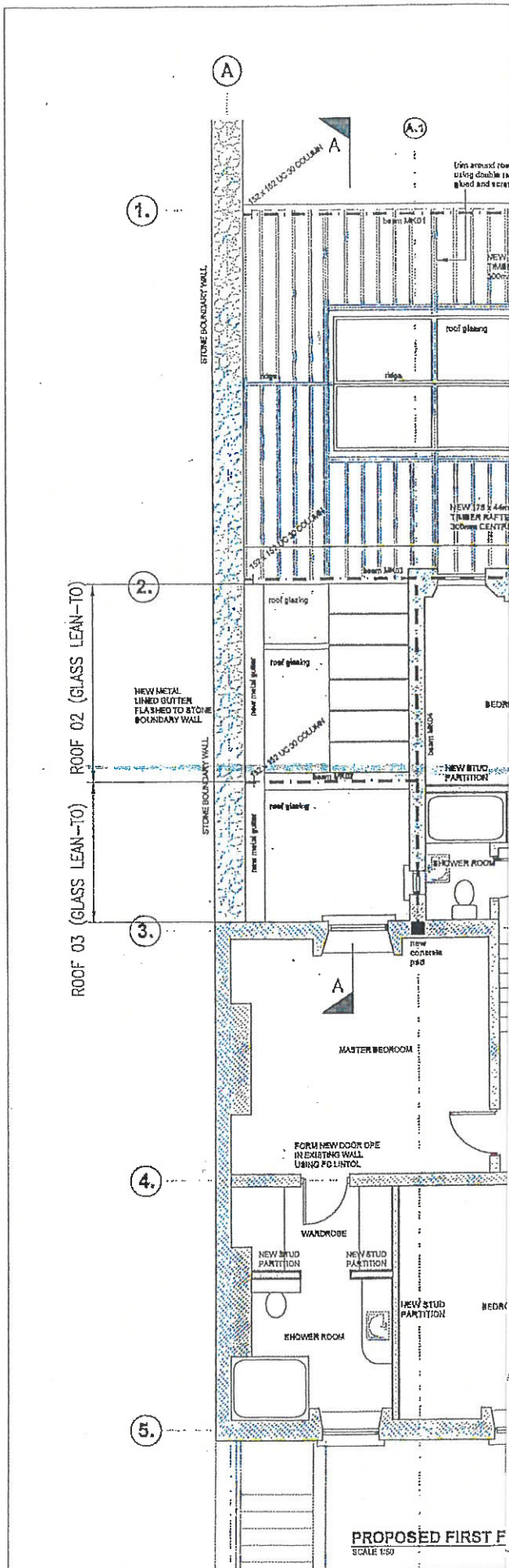
OS MAP 1:1000

Mac Donald Vagge
ARCHITECTS

PROJECT TITLE
ALTERATION TO 68, BRIGHTON ROAD, DUBLIN 6


DATE: FEB 2017
SCALE: 1:1000/1:500
DRG NO: 0341/PL03

CLIENT:
Garnay



AN BORD PLEANALA
 05 DEC 2019
 LTR DATED _____ FROM _____
 LDG- _____
 ABP- _____

CLIENT:
 JOB TITLE: EXTENSION TO THE REAR OF 65 BRIGHTON ROAD RATHGAR, DUBLIN 6
 DRAWING TITLE: PROPOSED FIRST AND TOP FLOOR STRUCTURAL PLANS AND SECTIONS



Fitzsimons Doyle & Associates
 258 Harold Cross Road, Dublin 18
 Tel: +353 (0) 464011 Fax: +353 (0) 4647618
 Web: www.fdcconsulting.ie Email: admin@fdcconsulting.ie

JOB No: 14/3507 DRAWING No: S-003 REV: P1

POSITION OF ROOF LIGHT



SECTION CC EXISTING 1:50

NO. 67, BRIGHTON ROAD 7132.5
 68, BRIGHTON ROAD
 NO. 69, BRIGHTON ROAD

AN BORD PLEANÁLA
 05 DEC 2019
 LTR DATED _____ FROM _____



SECTION DD EXISTING 1:50

PROPOSED 1:100

68, BRIGHTON ROAD, RATHGAR, DUBLIN 6

**ROOF LIGHT
 DETAILS**

DO NOT SCALE DRAWING. USE FIGURED DIMENSIONS ONLY.
 ALL DIMENSIONS TO BE CHECKED ON SITE

SCALE: 1:50	JOB NO: 0341	DRG NO: SK2
DATE: 1st July 2014	REV NO:	



Appendix 5

**Extract from Amendments
to Draft Development Plan
2005-2011**

273

Buildings proposed to have their

AN BORD PLEANALA

interior:

05 DEC 2019

LTR DATED FROM

LOG
ABP-

Fotal

Proposed Amended Descriptions

No.	Street Name	Post	Description	Amendment
1	Belmont Avenue	4	House. Exterior of buildings protected only	37
3	Belmont Avenue	4	House. Exterior of buildings protected only	
5	Belmont Avenue	4	House. Exterior of buildings protected only	
6	Belmont Avenue	4	House. Exterior of buildings protected only	
7	Belmont Avenue	4	House. Exterior of buildings protected only	
8	Belmont Avenue	4	House. Exterior of buildings protected only	
9	Belmont Avenue	4	House. Exterior of buildings protected only	
10	Belmont Avenue	4	House. Exterior of buildings protected only	
11	Belmont Avenue	4	House. Exterior of buildings protected only	
12	Belmont Avenue	4	House. Exterior of buildings protected only	
13	Belmont Avenue	4	House. Exterior of buildings protected only	
14	Belmont Avenue	4	House. Exterior of buildings protected only	
15	Belmont Avenue	4	House. Exterior of buildings protected only	
16	Belmont Avenue	4	House. Exterior of buildings protected only	
17	Belmont Avenue	4	House. Exterior of buildings protected only	
18	Belmont Avenue	4	House. Exterior of buildings protected only	
19	Belmont Avenue	4	House. Exterior of buildings protected only	
20	Belmont Avenue	4	House. Exterior of buildings protected only	
21	Belmont Avenue	4	House. Exterior of buildings protected only	
22	Belmont Avenue	4	House. Exterior of buildings protected only	
23	Belmont Avenue	4	House. Exterior of buildings protected only	
24	Belmont Avenue	4	House. Exterior of buildings protected only	
25	Belmont Avenue	4	House. Exterior of buildings protected only	
26	Belmont Avenue	4	House. Exterior of buildings protected only	
27	Belmont Avenue	4	House. Exterior of buildings protected only	
28	Belmont Avenue	4	House. Exterior of buildings protected only	
29	Belmont Avenue	4	House. Exterior of buildings protected only	
30	Belmont Avenue	4	House. Exterior of buildings protected only	
31	Belmont Avenue	4	House. Exterior of buildings protected only	
32	Belmont Avenue	4	House. Exterior of buildings protected only	
34	Belmont Avenue	4	House. Exterior of buildings protected only	
35	Belmont Avenue	4	House. Exterior of buildings protected only	
36	Belmont Avenue	4	House. Exterior of buildings protected only	
37	Belmont Avenue	4	House. Exterior of buildings protected only	
38	Belmont Avenue	4	House. Exterior of buildings protected only	
39	Belmont Avenue	4	House. Exterior of buildings protected only	
40	Belmont Avenue	4	House. Exterior of buildings protected only	

236

AN BORD PLEANÁLA

Total 40

No.	Street Name	05 DEC 2019 Post	Description	Amendment
41	Belmont Avenue	4	House. Exterior of buildings protected only	
42	Belmont Avenue	4	House. Exterior of buildings protected only	
43	Belmont Avenue	4	House. Exterior of buildings protected only	
44	Belmont Avenue	4	House. Exterior of buildings protected only	
45	Belmont Avenue	4	House. Exterior of buildings protected only	
46	Belmont Avenue	4	House. Exterior of buildings protected only	
47	Belmont Avenue	4	House. Exterior of buildings protected only	
48	Belmont Avenue	4	House. Exterior of buildings protected only	
49	Belmont Avenue	4	House. Exterior of buildings protected only	
50	Belmont Avenue	4	House. Exterior of buildings protected only	
51	Belmont Avenue	4	House. Exterior of buildings protected only	
52	Belmont Avenue	4	House. Exterior of buildings protected only	
53	Belmont Avenue	4	House. Exterior of buildings protected only	
54	Belmont Avenue	4	House. Exterior of buildings protected only	
55	Belmont Avenue	4	House. Exterior of buildings protected only	
56	Belmont Avenue	4	House. Exterior of buildings protected only	
57	Belmont Avenue	4	House. Exterior of buildings protected only	
1	Elmpark Avenue	6	House. Exterior of buildings protected only	
2	Elmpark Avenue	6	House. Exterior of buildings protected only	
3	Elmpark Avenue	6	House. Exterior of buildings protected only	
4	Elmpark Avenue	6	House. Exterior of buildings protected only	
5	Elmpark Avenue	6	House. Exterior of buildings protected only	
6	Elmpark Avenue	6	House. Exterior of buildings protected only	
7	Elmpark Avenue	6	House. Exterior of buildings protected only	
8	Elmpark Avenue	6	House. Exterior of buildings protected only	
9	Elmpark Avenue	6	House. Exterior of buildings protected only	
10	Elmpark Avenue	6	House. Exterior of buildings protected only	
11	Elmpark Avenue	6	House. Exterior of buildings protected only	
12	Elmpark Avenue	6	House. Exterior of buildings protected only	
13	Elmpark Avenue	6	House. Exterior of buildings protected only	
14	Elmpark Avenue	6	House. Exterior of buildings protected only	
15	Elmpark Avenue	6	House. Exterior of buildings protected only	
16	Elmpark Avenue	6	House. Exterior of buildings protected only	
17	Elmpark Avenue	6	House. Exterior of buildings protected only	
18	Elmpark Avenue	6	House. Exterior of buildings protected only	
19	Elmpark Avenue	6	House. Exterior of buildings protected only	
20	Elmpark Avenue	6	House. Exterior of buildings protected only	
21	Elmpark Avenue	6	House. Exterior of buildings protected only	
22	Elmpark Avenue	6	House. Exterior of buildings protected only	
23	Elmpark Avenue	6	House. Exterior of buildings protected only	

Proposed
Excluded
from proposed
RPS.

ITR DATED 05 DEC 2019 FROM
LDG-
ABP-

96
AN BORD PLEANÁLA

No.	Street Name	Post	Description	Amendment
24	Elmpark Avenue	6	House. Exterior of buildings protected only	
25	Elmpark Avenue	6	House. Exterior of buildings protected only	
26	Elmpark Avenue	6	House. Exterior of buildings protected only	
27	Elmpark Avenue	6	House. Exterior of buildings protected only	
28	Elmpark Avenue	6	House. Exterior of buildings protected only	
29	Elmpark Avenue	6	House. Exterior of buildings protected only	
30	Elmpark Avenue	6	House. Exterior of buildings protected only	
31	Elmpark Avenue	6	House. Exterior of buildings protected only	
32	Elmpark Avenue	6	House. Exterior of buildings protected only	
33	Elmpark Avenue	6	House. Exterior of buildings protected only	
34	Elmpark Avenue	6	House. Exterior of buildings protected only	
1	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
2	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
3	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
4	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
5	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
6	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
7	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
8	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
9	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
10	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
11	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
12	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
13	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
14	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
15	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
16	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
41	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
42	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
43	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
44	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
45	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
46	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
47	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
48	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
49	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
50	Elmwood Avenue Lower	6	House. Exterior of buildings protected only	
17	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
18	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
19	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	

LTR DATED _____ FROM _____
LDC-
ASP-

No. 40

05 DEC 2019

AN BORD PLEANÁLA
05 DEC 2019
LTR DATED _____ FROM _____
LDG- _____
ABP- _____

No. <u>40</u>	Street Name	Post	Description	Amendment
20	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
21	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
22	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
23	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
24	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
25	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
26	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
27	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
28	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
29	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
30	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
31	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
32	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
33	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
34	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
35	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
36	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
37	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
38	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
39	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
40	Elmwood Avenue Upper	6	House. Exterior of buildings protected only	
65	Highfield Road	6	House. Exterior of buildings protected only	
66	Highfield Road	6	House. Exterior of buildings protected only	
67	Highfield Road	6	House. Exterior of buildings protected only	
68	Highfield Road	6	House. Exterior of buildings protected only	
69	Highfield Road	6	House. Exterior of buildings protected only	
70	Highfield Road	6	House. Exterior of buildings protected only	
71	Highfield Road	6	House. Exterior of buildings protected only	
72	Highfield Road	6	House. Exterior of buildings protected only	
73	Highfield Road	6	House. Exterior of buildings protected only	
74	Highfield Road	6	House. Exterior of buildings protected only	
75	Highfield Road	6	House. Exterior of buildings protected only	
76	Highfield Road	6	House. Exterior of buildings protected only	
77	Highfield Road	6	House. Exterior of buildings protected only	
78	Highfield Road	6	House. Exterior of buildings protected only	
79	Highfield Road	6	House. Exterior of buildings protected only	
80	Highfield Road	6	House. Exterior of buildings protected only	
81	Highfield Road	6	House. Exterior of buildings protected only	
82	Highfield Road	6	House. Exterior of buildings protected only	
1	Killeen Road	6	2 storey Victorian	Exterior of buildings

At Dated

21

1

116

AN BORD PLEANÁLA

21 1890 Victorian Houses

116

05 DEC 2019

No.	Street Name	Post	Description	Amendment
			house c. 1890.	protected only
2	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
3	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
4	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
5	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
6	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
7	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
8	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
9	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
10	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
11	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
12	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
13	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
14	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
15	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
16	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
17	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
18	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
19	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
20	Killeen Road	6	2 storey Victorian house c. 1890.	Exterior of buildings protected only
21	Killeen Road	6	2 storey Victorian	Exterior of buildings

LTR DATED _____ FROM _____
 LDG- _____
 BP- _____

20

21

152 1890 Victorian Houses - Exterior only.
 + 9 Houses at Mount Eden Road.

95
 95 total

2-48 Killeen Road - Exterior only.
 36 Annual

No.	Street Name	Post	Description	Amendment
			AN BORD PLEANALA	
22	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
23	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
24	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
26	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
28	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
30	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
32	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
34	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
36	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
38	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
40	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
42	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
44	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
46	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
48	Killeen Road	6	house c. 1890. 2 storey Victorian	protected only Exterior of buildings
1	Mount Eden Road	4	House.	Exterior of buildings protected only
2	Mount Eden Road	4	House.	Exterior of buildings protected only
3	Mount Eden Road	4	House.	Exterior of buildings protected only
4	Mount Eden Road	4	House.	Exterior of buildings protected only
5	Mount Eden Road	4	House.	Exterior of buildings protected only
6	Mount Eden Road	4	House.	Exterior of buildings protected only
7	Mount Eden Road	4	House.	Exterior of buildings protected only
8	Mount Eden Road	4	House.	Exterior of buildings protected only
10	Mount Eden Road	4	House.	Exterior of buildings protected only

05 DEC 2019
 LTR DATED _____ FROM _____
 LDG- _____
 ABP- _____

71

20 + 31 = 71

AN BORD PLEANÁLA

05 DEC 2019

No. Total 40	Street Name	Post	Description	Amendment
11	Mount Eden Road	4	House.	Exterior of buildings protected only
12	Mount Eden Road	4	House.	Exterior of buildings protected only
13	Mount Eden Road	4	House.	Exterior of buildings protected only
14	Mount Eden Road	4	House.	Exterior of buildings protected only
15	Mount Eden Road	4	House.	Exterior of buildings protected only
16	Mount Eden Road	4	House.	Exterior of buildings protected only
17	Mount Eden Road	4	House.	Exterior of buildings protected only
18	Mount Eden Road	4	House.	Exterior of buildings protected only
19	Mount Eden Road	4	House.	Exterior of buildings protected only
20	Mount Eden Road	4	House.	Exterior of buildings protected only
21	Mount Eden Road	4	House.	Exterior of buildings protected only
22	Mount Eden Road	4	House.	Exterior of buildings protected only
23	Mount Eden Road	4	House.	Exterior of buildings protected only
24	Mount Eden Road	4	House.	Exterior of buildings protected only
25	Mount Eden Road	4	House.	Exterior of buildings protected only
26	Mount Eden Road	4	House.	Exterior of buildings protected only
196	Pearse Street	2	Houses/offices.	Exterior of buildings protected only
197	Pearse Street	2	Houses/offices.	Exterior of buildings protected only
198	Pearse Street	2	Houses/offices.	Exterior of buildings protected only
169	Rathmines Road Upper	6	House.	Exterior of buildings protected only
170	Rathmines Road Upper	6	House.	Exterior of buildings protected only
171	Rathmines Road Upper	6	House.	Exterior of buildings protected only
172	Rathmines Road Upper	6	House.	Exterior of buildings protected only
173	Rathmines Road Upper	6	House.	Exterior of buildings protected only
174	Rathmines Road Upper	6	House.	Exterior of buildings protected only
175	Rathmines Road Upper	6	House.	Exterior of buildings protected only
176	Rathmines Road Upper	6	House.	Exterior of buildings protected only
177	Rathmines Road Upper	6	House.	Exterior of buildings protected only
179	Rathmines Road Upper	6	House.	Exterior of buildings protected only
181	Rathmines Road Upper	6	House.	Exterior of buildings protected only
182	Rathmines Road Upper	6	House.	Exterior of buildings protected only
183	Rathmines Road Upper	6	House.	Exterior of buildings protected only
184	Rathmines Road Upper	6	House.	Exterior of buildings protected only
185	Rathmines Road Upper	6	House.	Exterior of buildings protected only
186	Rathmines Road Upper	6	House.	Exterior of buildings protected only
187	Rathmines Road Upper	6	House.	Exterior of buildings protected only
188	Rathmines Road Upper	6	House.	Exterior of buildings protected only
189	Rathmines Road Upper	6	House.	Exterior of buildings protected only
190	Rathmines Road Upper	6	House.	Exterior of buildings protected only
191	Rathmines Road Upper	6	House.	Exterior of buildings protected only

19 Rathmines Road Upper. Interiors excluded
 12 Summerville Park.

No.	Street Name	Post	Description	Amendment
192	Rathmines Road Upper	6	House.	Exterior of buildings protected only
193	Rathmines Road Upper	6	House.	Exterior of buildings protected only
194	Rathmines Road Upper	6	House.	Exterior of buildings protected only
195	Rathmines Road Upper	6	House.	Exterior of buildings protected only
196	Rathmines Road Upper	6	House.	Exterior of buildings protected only
197	Rathmines Road Upper	6	House.	Exterior of buildings protected only
199	Rathmines Road Upper	6	House.	Exterior of buildings protected only
201	Rathmines Road Upper	6	House.	Exterior of buildings protected only
203	Rathmines Road Upper	6	House.	Exterior of buildings protected only
205	Rathmines Road Upper	6	House.	Exterior of buildings protected only
207	Rathmines Road Upper	6	House.	Exterior of buildings protected only
209	Rathmines Road Upper	6	House.	Exterior of buildings protected only
211	Rathmines Road Upper	6	House.	Exterior of buildings protected only
213	Rathmines Road Upper	6	House.	Exterior of buildings protected only
215	Rathmines Road Upper	6	House.	Exterior of buildings protected only
217	Rathmines Road Upper	6	House.	Exterior of buildings protected only
219	Rathmines Road Upper	6	House.	Exterior of buildings protected only
221	Rathmines Road Upper	6	House.	Exterior of buildings protected only
223	Rathmines Road Upper	6	House.	Exterior of buildings protected only
3	Summerville Park	6	House.	Exterior of buildings protected only
4	Summerville Park	6	House.	Exterior of buildings protected only
5	Summerville Park	6	House.	Exterior of buildings protected only
6	Summerville Park	6	House.	Exterior of buildings protected only
7	Summerville Park	6	House.	Exterior of buildings protected only
8	Summerville Park	6	House.	Exterior of buildings protected only
9	Summerville Park	6	House.	Exterior of buildings protected only
10	Summerville Park	6	House.	Exterior of buildings protected only
11	Summerville Park	6	House.	Exterior of buildings protected only
12	Summerville Park	6	House.	Exterior of buildings protected only
14	Summerville Park	6	House.	Exterior of buildings protected only
15	Summerville Park	6	House.	Exterior of buildings protected only

Total 31

19 Rathmines Road Upper. Interiors excluded.
 12 Summerville Park.

VAL BORD PLEANÁLA

05 DEC 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

