

DEPUTY PLANNING OFFICER

APPLICATION NO. 3621/16
PROPOSAL PROTECTED STRUCTURE: Permission for development on this site of approximately 0.257 ha, site of the former Donnybrook Laundry, The Crescent, Donnybrook Dublin 4, D04 R856.
The development will consist of: the demolition of all structures other than the chimney stack (Protected Structure - Ref. RPS_8713 under the Amended Draft Dublin City Development Plan 2016-2022); and construction of a residential scheme comprising 25 No. apartments with private gardens (ground floor level) and balconies and terraces (first, second and third floor levels) in a four storey over basement block (composed of 4 No. 1- bedroom units, 13 No. 2-bedroom units and 8 No. 3-Bedroom units and security office) with an overall gross floor area of 4,801 sq m (including basement level). The development will also consist of the provision of: internal roads and footpaths; a basement car park to accommodate 35 No. car parking spaces (including 2 No. disabled car parking spaces), 25 No. bicycle parking spaces, circulation, plant, attenuation and service areas; and all other ancillary works including the widening and improvement of the existing vehicular entrance to the property from The Crescent to serve the development, waste management facilities, circulation areas, boundary treatments (including sections of new boundary wall), hard and soft landscaping treatments, works to the public pavement including options for public car parking and site excavation works above and below ground.

LOCATION Site of the former Donnybrook Laundry, Donnybrook Crescent , Donnybrook, Dublin 4.

APPLICANT MontLake QIAIF Platform ICAV

DATE LODGED 31-Aug-2016

ZONING ,

APPLICATION TYPE Permission

EH/sob
25/10/16

Site Notice: Site notice checked, in place and deemed in order on 14/09/16

Pre planning meeting – A pre planning meeting was held on site with the Planning Officer on the 28/04/16. The Conservation Officer then was consulted subsequent to this.

Zoning: Under the 2016-2022 Dublin City Development Plan the site is zoned Z1 which is “to protect, provide and improve residential amenities”
The Chimney on the site has been designated as a Protected Structure.
Site within Zone of Archaeological Interest
Chapter 2 is on Vision and Core Strategy
Chapter 11 is on Cultural Heritage

REP1letter

Chapter 14 on Land Use Zoning
Chapter 16 is on Development Standards,

Site Description:

The application site is located near the centre of Donnybrook Village approximately 2.5km from the City Centre. The site is connected to Donnybrook Village from the 'Crescent' which is narrow residential street but which also has a small commercial car park opposite some commercial premises. Further along the road is the rear access into the Donnybrook Garda Station, along with its car park. Adjoining the site to the north is red brick two storey terraced houses, with 3, 2 storey terraced properties directly opposite the site. The site directly faces the high stone rubblewall of the graveyard which runs down to Donnybrook Road. The wall curves around the historic churchyard and past St. Mary's Convent and Church lands.

The site contains a number of disused buildings which date from different era's, there is a two building on the street frontage to the site, to the north of which are single storey buildings.

The application site is the former Magdalene Laundry which ceased in 1992, when it was sold to a private company who operated the premises as a commercial laundry on the site till 2006 when it's operations ceased. The site has been left vacant since that time.

Proposed Development:

PROTECTED STRUCTURE: Permission for development on this site of approximately 0.257 ha, site of the former Donnybrook Laundry, The Crescent, Donnybrook Dublin 4, D04 R856. The development will consist of: the demolition of all structures other than the chimney stack (Protected Structure - Ref. RPS_8713 under the Amended Draft Dublin City Development Plan 2016-2022); and construction of a residential scheme comprising 25 No. apartments with private gardens (ground floor level) and balconies and terraces (first, second and third floor levels) in a four storey over basement block (composed of 4 No. 1- bedroom units, 13 No. 2-bedroom units and 8 No. 3-Bedroom units and security office) with an overall gross floor area of 4,801 sq m (including basement level). The development will also consist of the provision of: internal roads and footpaths; a basement car park to accommodate 35 No. car parking spaces (including 2 No. disabled car parking spaces), 25 No. bicycle parking spaces, circulation, plant, attenuation and service areas; and all other ancillary works including the widening and improvement of the existing vehicular entrance to the property from The Crescent to serve the development, waste management facilities, circulation areas, boundary treatments (including sections of new boundary wall), hard and soft landscaping treatments, works to the public pavement including options for public car parking and site excavation works above and below ground.

Relevant Site History

None found on APAS

Observations:

Prescribed bodies: None received

Third Parties: A number of submissions have been received to the application. The issues raised can be summarized as follows:

- Design of building not sympathetic to the surrounding two storey houses;
- Loss of privacy to residents of the Crescent;
- Narrow road already at full capacity with the Garda site opposite and suffers from congestion;
- Site should form some sort of memorial to those women who suffered and died;
- Impact of development on residential amenity;
- Potential for cars queuing on the road;

- Building should be stepped back further from the road;
- Historic context of the site should be marked;
- Site should not be built on as could have some burial sites;
- Concerns over impact of neighboring properties in particular No.21 Donnybrook Manor;
- Concerns in relation to overshadowing,
- Overlooking – balconies visually intrusive,
- entrance ramp to underground basement car park – will generate noise, light pollution, ramp should be relocated further away from boundary and security gates could add to noise levels;,,
- boundary treatment- density of trees should be increased to what is proposed.,
- height;
- Demolition works;

Interdepartmental Reports

Drainage: No objection provided specific requirements complied with.

Conservation: Recommends Refusal

- The proposed development has not had sufficient regard to the significance of the site and the inappropriate scale of the proposed development within this unique historic context will remove the special architectural character and the origins of the historic village of Donnybrook

Review of Planning file particulars

- The CO provided a detailed response to the pre-planning submission with regard to the significance of the site and its importance to the understanding of the evolution of Donnybrook from the earliest of times. Refer to attached report June 2016. The CO was no party to any further or subsequent discussions or documentation review. However, it is noted that there are many good examples of former industrial sites and their re-use and the provision of high quality residential accommodation. The fact that the structures are not fully protected within the RPS should not preclude their assessment or consideration for reuse in the context of our understanding of the importance of cultural landscapes and sites.
- The Applicant notes the benefit of the pre-planning response however little regard to the issues flagged in the CO's report appears to have resulted. The development response is in the opinion of the CO is a disappointing response to the architectural and historical richness of the site as well as a poor urban design approach which will undoubtedly remove the extraordinary nature of the historic place. This proposed development is inappropriate to the site and it is not mindful of supporting the long term survival of the architectural character or origins of the historic village of Donnybrook.
- The Current City Development Plan includes standards, policies and objectives to guide appropriate city development - concepts of sustainability, high quality urban design, the protection of historic village character, amenity and cultural heritage through re-use/re-cycling of historic buildings and safe guarding industrial archaeological sites - these themes should have a strong bearing on subject site and the proposal not only evaluated on units, square footage and densities.
- The justification for the extensive demolition appears to rest on the identification of the chimney only as having protected status – however, it is understood by well-informed conservators that the RPS and its review has not been fully achieved and as yet the inventory for Dublin is incomplete – interim survey information is only forthcoming from areas of the city within the canals to date. Furthermore the idea of a protected structure and its site is that a protected structure and structures associated with its former use may be regarded as being within the curtilage of the protected structure and therefore important to its setting and understanding. The extensive removal of historic fabric from an early industrial site originating from mid C18th and the subsequent evolution and expansion of the site through the C20th is flawed and negates future development potential to this historic village. The full removal of different building types and scale not only removes character but also potential

diversity of use and unique sense of place. This non-conservation stance may be regarded as a considerable and negative impact to the distinctiveness and understanding of the place. It is the CO's view that this proposal is shortsighted in its vision and that the merits of this site have been clearly overlooked/resisted.

- The sensitivity of the site immediate to the medieval graveyard defined by a medieval access route has not been adequately safeguarded by the proposed scheme. The proposed development departs significantly from the scale, grain and character of the adjoining terraces to provide an over-large, over-high and over-deep building form within the context of the medieval village. The overall result as evidenced by the 3-D images is the wedging of a monolithic block into an organic medieval context. The proposed site entrance proposes a building line struck by the development will fully remove the historic line and character of the crescent, as well as the former masonry enclosure and entrance to the site. In the opinion of the CO, the proposed scheme is akin to that of a substantial Docklands residential scheme achieved in a more robust planning context – in this instance the projecting access stair cores with a 4-storey street-fronted apartments and underpass entrance appear very foreign and out of kilter with the character area.

- In general, this proposal seeks to maximise development of the site, to impose scale and proportions of a main suburban thoroughfare and to infill without regard to the importance of the cultural landscape that has informed the development of the historic village. For the reasons set out above, the CO recommends a Refusal.

Architectural/Historical Assessment

The CO visited the proposed site to ascertain surviving significance and historical context. The site inspection reveals the medieval form of the crescent plan to be still discernible, with a unique Dublin road construction (medieval road construction to be confirmed) comprising of hand-won materials. The strategic nature of the site is confirmed/noted in the architectural heritage assessment by the origins of St. Mary's Magdalen's Asylum as Donnybrook Castle with planned landscape. The medieval closure has been respected despite many periods of construction as the building line for all structures accessed from this early route, known as the Crescent.

The Topographical Dictionary of Ireland, Vol 1, published by Samuel Lewis 1837, states, 'Lord Chief Justice Downes was born in the castle of Donnybrook, now a boarding school.'

In the opinion of the CO, this is a strategically important re-development site in the heart of the historic village of Donnybrook. The John Rocque Map c. 1756 of the environs of Dublin clearly depicts the harnessing of the River Dodder and its use to power mill structures – several structures are evident on the map at this stage. The core building would appear to be within the heart of the future early C19th asylum of St. Mary's and is likely to comprise a medieval stone structure, remade into a C18th residence.

The historical map appended above is from a much later date and indicates the expansion of St. Mary's Magdalen's mid C19th/C20th to the north encompassing the area of site now under review. The architectural heritage assessment advises on the more recent industrial uses of the buildings in the C19th and C20th. The assessment also suggests that the buildings of this site are all of C19th and C20th origins – in my opinion, this isn't the case and that certain mid C18th features are evident with the Crescent-fronted structure and gates. I would also suggest that the industrial site is integrally linked in terms of plan arrangement, technical construction, scale and layout of structures, landscaping, and situation to the historical river course, millrace and road. Thus, this may be regarded as a richly layered site of cultural significance comprising of many structures and landscape features such as the river, mill races and weir, the Crescent Road and adjoining culturally significant sites such as the castle and churchyard – the impact of the proposed development needs to have regard to all of these sensitive sites. For this reason, the CO recommends that its assessment should not exclude the significance of the principle structure within the adjoining St. Mary's site. The conservation-led approach arising from an understanding of the industrial archaeology of the

site recommends the re-use of existing structures and the consideration of appropriate uses and scale of development to safeguard the unique cultural heritage context. Whilst considered functional buildings they provide a unique character and sense of place and embody high quality materials. The industrial chimney is a nodal point within the historic village centre and visible from the main road through the village. The removal of the extant medieval road construction, culverts and boundaries would not be supported where enlarged access was required to service the extant site. Similarly mature trees and elements of a planned cultural landscape should be retained and access for building works to be carefully considered and planned for.

The City Archaeologist has indicated other sites that have been developed embracing their archaeological heritage. The recording of the surviving structures in accordance with the Industrial Archaeological guidelines as produced by the Heritage Council is noted as best practice. The input of a specialist conservator for industrial sites is recommended.

Archaeology:

It is noted that the proposed development is within the Zone of Archaeological Constraint for the Recorded Monument DU018-060 (Donnybrook/Ballsbridge Settlement), which is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. Further, the site in question is located within the Zone of Archaeological Interest in the Dublin City Development 2011-17.

The application is accompanied by an archaeological assessment entitled 'Archaeological assessment at The Crescent, Donnybrook, Dublin 4' by Faith Bailey and Brenda Fuller of IAC dated July 2016.

The proposed development consist of the former lands of Saint Mary's Convent and the Magdalen Laundries, and is in close proximity to a possible early medieval settlement according to the assessment.

Given its association with the Magdalen laundries there is potential for burials being uncovered during the course of works according to section 4.2 of the assessment.

The assessment recommends that a detailed archaeological testing assessment should be carried out once demolition works have been carried out within the proposed development.

Planning Assessment:

The application site is for development on this site of approximately 0.257 ha, site of the former Donnybrook Laundry, The Crescent, Donnybrook Dublin 4, D04 R856.

The development will consist of: the demolition of all structures other than the chimney stack (Protected Structure - Ref. RPS_8713 under the Dublin City Development Plan 2016-2022); and construction of a residential scheme comprising 25 No. apartments with private gardens (ground floor level) and balconies and terraces (first, second and third floor levels) in a four storey over basement block (composed of 4 No. 1- bedroom units, 13 No. 2-bedroom units and 8 No. 3-Bedroom units and security office) with an overall gross floor area of 4,801 sq m (including basement level).

It should be noted that the site is zoned for residential use. The development will also consist of the provision of: internal roads and footpaths; a basement car park to accommodate 35 No. car parking spaces (including 2 No. disabled car parking spaces), 25 No. bicycle parking spaces, circulation, plant, attenuation and service areas; and all other ancillary works including the widening and improvement of the existing vehicular entrance to the property from The Crescent to serve the development, waste management facilities, circulation areas, boundary treatments (including sections of new boundary wall), hard and soft landscaping treatments, works to the public pavement including options for public car parking and site excavation works above and below ground.

The first issue in relation to this application is the zoning for the site which is Z1 for residential use. The site has been vacant for 10 years following the departure of the commercial laundry which bought it from the Nuns. The tall red brick chimney on the site is a Protected Structure and the site is therefore within its curtilage.

The proposal is for the demolition of all extant buildings on the site. The applicant has submitted a 'Built Heritage Assessment' report on the site. It details the historical context to the site. It notes that examination of the buildings at present on the application site has shown that there are no buildings that survive from the earlier period prior to the acquisition of the property by the Sisters of Charity. It notes the buildings on site today range in date from the late 19th century to the 1970s. The earliest building is the two storey structure bounding 'The Crescent', and was an addition to the laundry that had been operating on the site to the south since the 1830's which is not part of this site.

The report notes the chimney is unusual in its late date not being constructed until after 1938. It is a striking structure the report notes, due to its height and would be a historic landmark and reminder of the industrial past than a building of any architectural or technological interest. It notes buildings on the site do not have historical significance and are typical of their period.

The City Council Conservation section have reviewed the file and notes that while the chimney is identified as the protected structure on the site and not the buildings this does not mean that the buildings should be precluded from an assessment for reuse in the context of our understanding of the importance of cultural landscapes and sites. They consider that the proposed development is inappropriate to the site and not mindful of supporting the long term survival of the architectural character of origins of the historic village of Donnybrook. The Conservation Report notes further:

- *The extensive removal of historic fabric from an early industrial site originating from mid C18th and the subsequent evolution and expansion of the site through the C20th is flawed and negates future development potential to this historic village. The full removal of different building types and scale not only removes character, but also potential diversity of use and unique sense of place. This non-conservation stance may be regarded as a considerable and negative impact to the distinctiveness and understanding of the place. It is in the opinion of the CO that this proposal is shortsighted in its vision and that the merits of this site have been clearly overlooked/resisted.*

The report goes on to note that the sensitivity of the site immediate to the medieval graveyard defined by a medieval access route has not be adequately safeguarded by the proposed scheme. The proposed development departs significantly from the scale, grain and character of the adjoining terraces to provide an over-large, over-high and over-deep building form within the context of the medieval village.

The report goes on to note:

"The architectural heritage assessment advises on the more recent industrial uses of the buildings in the C19th and C20th. The assessment also suggests that the buildings of this site are all of C19th and C20th origins – in my opinion this isn't the case and that certain mid C18th features are evident with the Crescent fronted structure and gates. I would also suggest that the industrial site is integrally linked in terms of plan arrangement, technical construction, scale and layout of structures, landscaping, and situation to the historical river course, millrace and road. Thus, this may be regarded as a richly layered site of cultural significance comprising of many structures and landscape features such as the river, mill races and weir, the Crescent Road and adjoining culturally significant sites such as the castle and churchyard – the impact of the proposed development needs to have regard to all of these sensitive sites. For this reason the CO recommends that its assessment should not exclude the significance of the principle structure within the adjoining St. Mary's site. ...

The industrial chimney is a nodal point within the historic village centre and visible from the main road through the village. The removal of the extant medieval road construction, culverts and boundaries would not be supported where enlarged access was required to service the extant site. Similarly mature trees and elements of a planned cultural landscape should be retained and access for building works to be carefully considered and planned for."

It should therefore be noted that the City Conservation Section have grave reservations regarding the proposal and the removal of all extant buildings. They consider that the proposed new block at 4 stories is not appropriate to the site which is set within a very historic location in Donnybrook Village opposite the graveyard with a long standing historical context. The Conservation Section notes that the building facing directly onto the road: *'The assessment also suggests that the buildings of this site are all of C19th and C20th origins – in my opinion this isn't the case and that certain mid C18th features are evident with the Crescent fronted structure and gates.'* Further information will therefore need to be sought on the serious concerns raised by the Conservation Section prior to a decision being made.

The proposal then is for a part three part four storey continuous residential block which allows for car to pass through an undercroft down to basement car parking. Above the vehicular passageway is two floors of residential apartments. The applicants state the apartments are arranged along The Crescent keeping a maximum distance from the west site boundary, with the three stair and lift cores expressed vertically over four levels. The orientation the applicant states allows natural daylight into all parts of the building without the need for any windows along shared boundaries. The height of the building is reduced from 4 to 3 to 2 stores adjacent to the red brick terrace of houses in order to bring the scale of the proposed building in line with its context. The building also reduces in depth to keep a respectable distance from the protected chimney.

The front façade is set back between the lift cores to allow ample space for creating a living streetscape and to provide a footpath for pedestrian use. A vehicular and pedestrian entrance will allow for visual permeability to the chimney. The mass of the building is reduced by the creation of terraces set back on the uppermost floor level.

The applicants planning report have noted that the key town planning issues were as follows:

- Microclimatic issues, including the visual impact and overshadowing;
- Archaeological potential of the site;
- Built heritage and conservation issues regarding the Protected Chimney Stack;
- Access, traffic and car parking;
- Provision of quality public open space; and
- Provision of quality private open space.

The report notes that the design allows the development to animate the street by having three of the lift and stair cores directly onto the street. These lobbies stretch back to the rear of the street also. The lift cores will be lit by a series of glazed corners along the northern elevations. Further glazing is proposed along the top set back level in order to further reduce the physical impact. The cores will have a zinc cladding while the rest of the front façade will be in a heritage brick. The applicant considers the use of different materials along with the setting back of the top level also reduces the mass and scale of the buildings along The Crescent. The rear southwest facing façade is dominated by the apartment balconies and terraces, which are constructed in steel and glass to create a light open aesthetic which will overlook the gardens below.

Horizontal wood composite battens are proposed at the main vehicular entrance and at the street entrance to each stair core. These battens are also incorporated into the privacy screens located on the balconies to the rear, overlooking the gardens. Wood composite is virtually identical to timber with the additional benefit that the material does not bleach due to exposure to sunlight or rot due to wetness. A bleached oak finish is proposed. They note the zinc finish on the stair cores will provide a light and contemporary contrast to the

heaviness of the adjacent brick.

The applicants note that the City Council's Public Art Department has been contacted with a view to ascertaining a suitable location, design and scale for the proposed art piece. The sculpture will be located externally on the grounds. It is noted in the Planning Report that the applicant would commission the sculpture and liaise with the Public Arts Department.

The applicant notes in their Planning Report that the scheme exceeds the standards as laid out in the 'Sustainable Urban Housing – Design Standards for New Apartments' which were published in December 2015. They note the public/communal open space area is in excess of the required standards. The communal open space is highly useable being provided within a landscaped courtyard. It is well overlooked and has a south facing orientation.

The main issue with regards to the proposal is that the public open space along with the proposed 'sculpture' is only accessible through the undercroft and as such would not be the most accessible or inviting for members of the public. The two floors of building overhanging, the pedestrian and vehicular entrance is a concern, making the visual permeability into the site limited. Having two floors of building is also considered to further detract from the view of the Chimney which is a Protected Structure but also from the streetscape due to the extent of the building along the site. The Planning Authority has serious concerns regarding this aspect of the development. The site is of particular importance due to its historical and social context and therefore the development has to have due regard to these issues. What would also be important to note is any remaining artifacts which may be of interest to the general public and to ensure that the applicant liaises with the relevant authorities, public bodies if there are found to be of interest.

There are a number of outstanding issues regarding the proposal that need further clarification, it is therefore proposed that further information is sought on these issues prior to a decision being made.

Recommendation:

The applicant is requested to submit the following further information:

1. The Planning Authority has serious concerns that the proposed development has not given sufficient weight to the cultural, historical and conservation significance of the site. The applicant is therefore requested to respond to the following issues:

(i) The industrial chimney which is a Protected Structure within the site and is a nodal point within the historic village requires careful consideration to ensure that its setting is afforded adequate protection and that the proposed development does not obscure views into the site and to the chimney and proposed sculpture. The applicant is therefore requested to respond to the concerns of the Planning Authority in relation to building over the proposed vehicular and pedestrian entrance with a first and a second floor which adds to the quantum of development facing onto this quiet street but which also obscures the views into the site and to the Chimney which is a Protected Structure and to the proposed 'sculpture' which is proposed to have regard to the social context of the site as a former Magdalene Laundry.

(ii) The Conservation Section has indicated that certain mid C18th features are evident in 'The Crescent' fronted structure and gates and require further assessment in light of the proposed demolition.

(iii) The applicant is requested to demonstrate that the proposed development does not

negatively impact on the character of the road and adjoining sites and that it has taken due regard in its design and choice of materials so that any new build complements the site and its historical context, in this regard the applicant is requested to review the zinc finish of the proposed stair cores.

2. The applicant is requested to clarify if there are any remaining artifacts within these extant buildings which may be of interest to the general public considering its historical and social past and to show that if so that the applicant is willing to liaise with the relevant authorities, public bodies if anything is found to be of interest.