

# **SOUTH DUBLIN COUNTY COUNCILS**

## **ARCHITECTURAL CONSERVATION OFFICER REPORT**

**RE: SD22A/0271 – Prospect House, Stocking Lane, Rathfarnham, Dublin 16.**

### **Record of Protected Structures**

Prospect House is referred to in the Council's Record of Protected Structures - Schedule 2 of the South Dublin County Development Plan 2022-2028 under Map Ref. No.340. Under Section 2 of the Planning and Development Act 2000, the term 'structure' means "*any building, structure, excavation, or other thing constructed or made on, in, or under any land, or any part of a structure so defined, (a) where the context so admits, includes the land on, in or under which the structure is situate, and (b) in relation to a protected structure or proposed protected structure, includes (i) the interior of the structure, (ii) the land lying within the curtilage of the structure, (iii) any other structures lying within that curtilage and their interiors, and (iv) all fixtures and features which form part of the interior or exterior of any structure or structures*". Therefore, the entire site is a protected structure, including all existing buildings on site including their exteriors, interiors, fixtures and fittings. The Protection also extends to the lands of the site and as such come under the provisions of the Planning and Development Act 2000.

### **Appraisal**

This is an application for (a) demolition of some existing structures on site; (b) the internal modification /reconfiguration and refurbishment of and extension to Prospect House (a protected structure RPS 340) and the renovation and modification of its associated coach house to provide for a 4-bed dwelling with associated private open space and car-parking provision; (c) the re-opening of a gap between Prospect House and its detached coach house to the rear to provide a gated access into the new communal gardens proposed to the west of Prospect House; (d) Reconstruction of the Gate Lodge (in ruins) to provide for a 2-bed, single storey dwelling 63.4sqm with associated private open space and car-parking; (e) the provision of 1 apartment block (3-storey plus setback penthouse level) to the western side of Prospect House to provide for 22 residential units (11 one bedroom units and 11 two bedroom units) over a single storey basement comprising a total of 25 car parking spaces, 2 motor bike spaces and 40 bicycle parking spaces; The basement will also include associated bin stores, plant and storage rooms; (f) Removal of a portion of the western boundary wall to provide a new vehicular & pedestrian access from Stocking Lane to the new apartment block; (g) All associated hard & soft landscaping, including the provision of a play area and an ESB sub-station & all associated engineering & site development works necessary to facilitate the development, all on a site of 0.51ha at Prospect House (a protected structure RPS 340).

The most recent planning application (SD19A/0312) included for the construction of 4-storey apartment block to include basement car park and setback penthouse level. This provides 25 residential units. The development also included internal modifications and layout of Prospect House; a protected structure (RPS Ref. 340) detailed above to provide 4 units within the original house. It is also proposed to construct an extension and carry out internal revisions to the existing detached outbuildings and courtyard to the rear.

It should be noted that a previously planning application for development within the curtilage of Prospect House was refused under Reg. Ref. SD18A/0181 and SD19A/0312. Having assessed the planning application it is very disappointing to see after two previous refusals that a further application for apartments has been submitted rather than a development type that would sit sensitively within the site and have due regard to the overall context within the curtilage and existing walled garden area of the Prospect House.

Under previous applications the assessment provided within the Councils Architectural Conservation Officers report has stated that *“The proposed development constitutes overdevelopment of the site and completely detracts from the setting of the Protected Structure. The overall negative impact and the further reduction in formal setting by way of complete development of the walled garden, would materially affect the character of the Protected Structure and its setting. The proposed development would have further visual negative impact along Stocking Lane and the surrounding area due to its location and the proposed height, scale and mass which would be highly visible along the existing streetscape. Once again, no attempt has been made to design a low-level contemporary scheme which would sit better within the subject site and allow for a high-quality development set within a historic landscape setting with Prospect House as providing architectural quality and character”*.

#### Proposals re Protected Structure and associated buildings

It should be noted that a Conservation Report should have been provided for the Protected Structure, to include a room-by-room account and a method statement and schedule of works, along with an overall assessment of impact on the proposed works and mitigation for same. As such a Conservation Report carried out by a suitably qualified Conservation Architect should be submitted to include a Method Statement for proposed works to the Protected Structure (Prospect House, RPS Ref. 340) including the works/proposed changes to the original built fabric to facilitate a new rear extension. The Gate Lodge and Coach House within the curtilage of the Protected Structure, should be included in the Conservation Report and Architectural Impact Assessment.

Under the current application the reuse of the existing Coach House to the rear is proposed is welcomed, however there is very little information on the current stable building and the works required for its adaptative reuse for residential is provided. Overall, the planning application lacks the necessary assessment of the Protected Structure and its associated buildings. The Coach House is not included in the Architectural Impact Assessment Report and there are no photographs showing the current condition to the interior/exterior of the Coach House or Gate Lodge. It is proposed to demolish the existing Gate Lodge which is in a ruinous condition.

In order to full assess the proposals for its removal and its replacement with a new larger structure its demolition will have to be justified and therefore a full and proper record/survey is required.

The demolition of the existing gate lodge has not been justified and no effort has been provided in order to retain the original structural elements and incorporate this into a new structure, thereby retaining the original fabric. It is considered that in order to facilitate any new development within the curtilage of the Protected Structure certain elements/architectural features and associated structures need to be retained in order to retain the overall character of the site and setting of the Protected Structure. It is therefore considered that the necessary detail and retention of elements should be submitted as further information. The proposed design for the gate lodge and the design ethos has been considered however the demolition needs justification along with considering the retention of the original fabric.

The assessment provided is insufficient and fails to provide a proper overview and account of the entire site context and protected structures. There is very little information provided with regard to the justification for the removal of rear porch and WC and also a large section of original boundary wall to facilitate a new vehicular entrance. As already stated the Architectural Impact Assessment Report provides no detail on the proposed level and scope of works required to the protected structure and its associated structures (gate lodge and coach house) it fails to provide specifications and methodology for the works required along with details on insertion of services, fire safety and energy upgrading works in line with CDP climate change requirements with regard to thermal upgrading etc all of which should be included in a Conservation Report prepared by a Conservation Architect which will allow a proper assessment of the proposed works. A full assessment of the direct impact on the original built fabric of the protected structure is difficult as there is no method statement and schedule of works providing a room-by-room account of the works required especially works to allow fire safety upgrades etc and insertion of additional services.

It should be noted that there is evidence that works have been carried out to include fire alarms and lighting with upgrading of services without planning permission being sought. It is completely unacceptable that the owners of the property have carried out any such works without the proper approval and formal permission. The owners would be aware given the previous applications submitted that any works to Prospect House, Protected Structure (RPS Ref. 340) or within its curtilage would require planning permission. The undersigned has no knowledge of this work and has no way of assessing the work that has been carried out to date. In order to assess the works which are believed to have been carried out to the Protected Structure without planning permission or an appropriate Declaration a full survey should be provided as part of the Conservation Report in order to detail the current condition and the recent works undertaken.

Under the previous planning applications (Reg. Ref. SD18A/0181 and SD19A/0312) the issue of the re-use and suitable adaptability of Prospect House and the existing single-storey gate lodge was raised. The current proposal allows for the continued residential use of Prospect House with the reuse of the existing Coach House and new Gate Lodge also for residential use.

During a pre-planning meeting during 2019 it was advised that the amount of development being sought should be reduced in order to provide a more suitable type of development on a smaller scale within the curtilage of the protected structure, therefore minimising the overall impact on the protected structure site. It was suggested that in order to allow the protected structure to be re-used that in principle extending the house to the rear by way of providing more useable floor space could be considered. The current proposal includes for a rear/side extension which is of contemporary design and allows the new addition to read clearly in contrast to the Protected Structure. In principle the proposed rear/side extension is acceptable and details of how the extension will be inserted, and the overall design and materials should be included in the Conservation Report and Impact Assessment.

With regard to the overall setting and curtilage of the Protected Structure, as previously detailed in reports by the undersigned the Walled Garden is of particular importance with regard to the existing landscape setting and site context. It is therefore of upmost importance that any development within the walled garden area is a small-scale development which sits sensitively within this location and as part of the setting. Currently the development reads as a separate development site as there is very little incorporation within the site of the existing Protected Structure, its architectural features/structures, and the new development. The new units would constitute overdevelopment of the site and although there is set back provided the apartment building will dominate the site and completely consume the setting and visual integrity of Prospect House.

The site context and the relationship of the protected structure and the walled garden and existing setting needs to be re-examined with regard to the overall design of any new development. As previously highlighted as part of the assessment for previous proposals any new development should read as associated structures/vernacular buildings which would clearly read as secondary buildings within the site and that would be designed using vernacular elements and materials in order that a sensitive building type can sit within the walled garden in a sensitive nature and add architectural interest and high-quality architectural design elements to the site.

#### Proposed 22 Units

Although the proposed apartment development has been set back to improve the views of the Protected Structure there are still concerns on the overall impact of such a development within the original walled garden. These concerns have been outlined under the previous applications which were refused. *“The current proposal for the construction of The proposed height, scale and mass of apartment blocks allows the new build which is located within the existing wall garden to completely overshadow and dominate the Protected Structure. The new development fails to be sensitive to the Protected Structure with regard to its location within the site. The insertion of such a massive apartment block and the removal of the original stone boundary wall which runs along Stocking Lane to allow for a large access to the existing site and underground carpark, completely changes the overall character and visual quality of the area at this location”.*

The proposed development continues to constitute overdevelopment of the site and completely detracts from the setting of the Protected Structure. The overall negative impact and the further reduction in formal setting by way of complete development of the walled garden, would materially affect the character of the Protected Structure and its setting. The proposed development would have further visual negative impact along Stocking Lane and the surrounding area due to its location and the proposed height, scale and mass which would be highly visible along the existing streetscape.

The overall design continues to read as generic apartment units without any design rationale based on the overall existing site context and proposal within the curtilage of a Protected Structure. It continues to be viewed out of place within the surrounding area. No attempt has been made to design a low-level contemporary scheme which would sit better within the subject site and allow for a high-quality development set within a historic landscape setting with Prospect House, in providing architectural quality and character. It should be noted that the Planning Statement provides examples of other developments within the curtilage of Protected Structure sites, however the development proposed fails to reflect any of the smaller scale developments as precedent cases within a protected structure. Applications not included are Rockbrook House and Ballyroan House, where developments opted for a mixed use and residential type units that reflected the context of the site in ensuring sensitive development.

The development is located within the original walled garden which will result in the loss of original features and relationship and connection of the Main House and the formal setting/associated features. The setting of Prospect House has been completely diminished due to previous housing developments such as Prospect Manor, therefore the existing setting including walled garden, avenue and rear site is particularly important in providing adequate setting to the existing Protected Structure. Allowing further development of this scale within the curtilage will completely destroy the existing setting and overall architectural quality of the site. This issue has been raised a number of times during pre-planning meetings and as part of assessments for previous proposals.

It is not considered acceptable to propose such a large-scale development within the curtilage of a Protected Structure and completely redevelop the existing buildings without due consideration to the site context and a how low-scale contemporary development and adaptative reuse of the protected structure and outbuildings could be delivered. On this basis the planning consultant and architects were advised to look at examples of low-level developments which were achieved in a sensitive manner within the curtilage of Protected Structures. This is documented in the planning report, however there is no evidence that having looked at exemplar sites that the proposed development or overall site context has been re-evaluated in providing a more sensitive and suitable development for this site. Reference is also made to Archaeological policies in relation to development within the curtilage of a Protected Structure rather than the correct CDP policies which relate to Protected Structures and specifically to developments within the curtilage of a Protected Structure site.

The visual link from the Protected Structure (Prospect House, RPS ref. 340) from Stocking Lane and the removal of a large section of original boundary wall completely changes the overall character of the site and area. The large apartment block completely dominates the entire site which is unacceptable

The proposed development in its current form would result in an irreparable negative change to the character of the Protected Structure and its setting, and it is for this reason and the concerns outlined above that the proposed development should be completely redesigned. A number of other items need to be addressed with regard to the proposed works to the Protected Structure (Prospect House RPS Ref. 340), Coach House and Gate Lodge as part of any request for Further Information.

### **Recommendation**

It is considered that a number of items need to be addressed. As such there are a number of concerns that in its current form the proposed development and in particular the new build will cause a loss of setting and compromise the visual integrity and setting of Prospect House, Protected Structure (RPS Ref. 340).

1. Due to the following concerns, it is recommended that the new development should be completely redesigned to provide a more suitable and sensitive development within the walled garden area of the Protected Structure as follows;
  - The proposed apartment development within the curtilage of the Protected Structure is not acceptable in its current form. The proposed development still remains to be inappropriate in terms of scale, height, mass, and overall design which allows the proposed new build to be the dominate structures on the site. It is considered that allowing a 4-storey, large scale apartment block within the walled garden of the site allows the entire site to be compromised.
  - With regard to the overall setting and curtilage of the Protected Structure. As previously detailed in reports by the undersigned the Walled Garden is of particular importance with regard to the existing landscape setting and site context. It is therefore of upmost importance that any development within the walled garden area is a small-scale development which sits sensitively within this location and as part of the setting. Currently the development reads as a separate development site as there is very little incorporation within the site of the existing Protected Structure, its architectural features/structures, and the new development.
  - The new units would constitute overdevelopment of the site and although there is set back provided the apartment building will dominate the site and completely consume the setting and visual integrity of Prospect House. The site context and the relationship of the protected structure and the walled garden and existing setting needs to be re-examined with regard to the overall design of any new development. As previously highlighted as part of the assessment for previous proposals any new development should read as associated structures/vernacular buildings which would

clearly read as secondary buildings within the site and that would be designed using vernacular elements and materials in order that a sensitive building type can sit within the walled garden in a sensitive nature and add architectural interest and high-quality architectural design elements to the site.

- The visual link from the Protected Structure (Prospect House, RPS ref. 340) from Stocking Lane is lost and the removal of a large section of original boundary wall completely changes the overall character of the site and area. In order to provide a second vehicular entrance, the proposed removal of a large section of original boundary wall is proposed, thereby completely changing the overall character of the site and existing streetscape. No such justification has been provided for the removal of a large section of original boundary wall. This concern was highlighted previously with regard to the impact and loss of original fabric.

It is therefore considered that the proposed development should be revised in order to provide for a low level, reduce mass/form and more suitable building type within the walled garden area.

The following items should be requested as part of a request for Further Information in order to address the lack of detail and items of concern;

2. A Conservation Report carried out by a suitably qualified Conservation Architect should be submitted to include a method statement for proposed works to the Protected Structure (Prospect House, RPS Ref. 340) including the works/proposed changes to the original built fabric to facilitate a new rear extension. The Gate Lodge and Coach House within the curtilage of the Protected Structure, should be included in the overall Conservation Report. A Conservation Report should include a room-by-room account and a Method Statement and Schedule of Works, along with an overall assessment of impact on the proposed works and mitigation for same.
3. The Architectural Impact Assessment Report provides no detail on the proposed level and scope of works required to the protected structure and its associated structures (gate lodge and coach house) it fails to provide specifications and methodology for the works required along with details on insertion of services, fire safety and energy upgrading works in line with CDP climate change requirements with regard to thermal upgrading etc all of which should be included in a Conservation Report prepared by a Conservation Architect which will allow a proper assessment of the proposed works.

A full assessment of the direct impact on the original built fabric of the protected structure is difficult as there is no method statement and schedule of works providing a room-by-room account of the works required especially works to allow fire safety upgrades etc and insertion of additional services. The Architectural Impact assessment also fails to provide a proper overview and account of the entire site context and Protected Structure. There is very little information provided with regard to the justification for the removal of rear porch and WC and also a large section of original boundary wall to facilitate a new vehicular entrance.

4. It should be noted that there is evidence that works have been carried out to include fire alarms and lighting with upgrading of services without planning permission being sought. It is completely unacceptable that the owners of the property have carried out any such works without the proper approval and formal permission. The owners would be aware given the previous applications submitted that any works to Prospect House or within its curtilage would require planning permission.

The undersigned has no knowledge of this work and has no way of assessing the work that has been carried out to date. In order to assess the works which are believed to have been carried out to the Protected Structure without planning permission or Declaration a full survey should be provided as part of the Conservation Report in order to detail the current condition and the recent works undertaken in order that these works are regularised. This item needs to be addressed in the response to the Request for Further Information.

5. The demolition of the existing gate lodge (ruinous structure) has not been justified and no effort has been provided in order to retain the original structural elements and incorporate this into a new structure, thereby retaining the original fabric. It is considered that in order to facilitate any new development within the curtilage of the Protected Structure certain elements/architectural features and associated structures need to be retained in order to retain the overall character of the site and setting of the Protected Structure. It is therefore considered that the necessary detail and retention of elements should be submitted as further information. The proposed design for the gate lodge and the design ethos has been considered, however the demolition needs justification along with considering the retention of the original fabric.

**Irenie McLoughlin**  
**Architectural Conservation Officer**

**Date:** 4<sup>th</sup> August 2022